

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Consolidated Civil Action**

RALEIGH WAKE CITIZENS
ASSOCIATION, et al.

Plaintiffs,

v.

WAKE COUNTY BOARD
OF ELECTIONS,

Defendant.

No. 5:15-cv-156

CALLA WRIGHT, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA,
et al.,

Defendants.

No. 5:13-cv-607

**DECLARATION OF ANITA S. EARLS IN SUPPORT OF PLAINTIFFS' MOTION
FOR ATTORNEYS' FEES, EXPERT FEES, AND LITIGATION EXPENSES**

I, Anita S. Earls, declare under penalty of perjury that the following is true and correct:

1. I am counsel for all Plaintiffs in the above-styled consolidated actions.
2. I am the Executive Director of the Southern Coalition for Social Justice in Durham, NC. My organization was retained in 2013 to represent Plaintiffs in *Wright v. North Carolina*, an equal protection challenge to the 2013 redistricting plan for the Wake County Board

of Education, and in 2015 to represent the Plaintiffs in *Raleigh Wake Citizens Association v. Wake County Board of Elections*, an equal protection challenge to the identical 2015 redistricting plan for the Wake County Board of Commissioners.

3. I am a 1988 graduate of Yale Law School and was admitted to practice law in the State of North Carolina in April 1988. I have been a member of the Supreme Court Bar since June 1994, and a member of the District of Columbia Bar since 2001. I am admitted to practice in each of the Federal District Courts in the State of North Carolina.

4. I have extensive experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

5. I have argued voting rights cases in the 1st, 4th, and 11th Circuit Courts of Appeals, including winning an en banc argument in the U.S. Court of Appeals for the First Circuit.

6. In addition, I have written numerous briefs for the United States Supreme Court, including the brief for Defendant-Intervenors in *Shaw v. Hunt*, congressional redistricting litigation in the 1990s, and for Defendant-Intervenors in *Dean v. Leak*, legislative redistricting litigation from the Eastern District of North Carolina.

7. I was lead counsel in *NAACP v. Harris*, No. 01-civ-120 (S.D. Fla. 2001), federal court litigation raising voting rights claims on behalf of the Florida NAACP in Florida following the 2000 election.

8. Overall, I have been counsel in over 30 federal cases raising a variety of voting rights claims. Attached as Exhibit A to this Declaration is a list of reported opinions in cases involving voting rights claims in which I served as counsel for a party in the case and in which I

have taken an active role in the litigation. Exhibit A does not include voting rights cases that were resolved by settlement or without reported opinions, cases in which I have submitted amicus briefs, and cases currently pending where no published opinion has been issued.

9. I have been an Adjunct Professor at University of North Carolina School of Law and University of Maryland School of Law; an Adjunct Professor in the African and African-American Studies Department at Duke University; and I held the post of a Visiting Research Fellow at the Social Science Research Institute, Center for Race, Ethnicity and Gender in the Social Sciences in 2009-2012, conducting research on census and redistricting issues. I have published articles on voting rights issues in law reviews, popular journals and edited volumes, and I have been a presenter at many continuing legal education programs, conferences, and forums.

10. In July 2009, I was appointed by Governor Perdue to serve on the North Carolina State Board of Elections. In 2006, I was appointed to the North Carolina Equal Access to Justice Commission by the Chief Justice of the North Carolina Supreme Court, and I served as Secretary for the Commission.

11. In 1998 I was appointed by President Clinton to serve as a Deputy Assistant Attorney General in the Civil Rights Division of the U.S. Department of Justice. As part of my duties, I had responsibility for the Voting Section of the Civil Rights Division. I was the Director of the Voting Rights Project for the Lawyers' Committee for Civil Rights Under Law in Washington, D.C. for two and a half years. My CV is attached as Exhibit B.

12. As Executive Director for the Southern Coalition for Social Justice, I have ultimate supervisory responsibility for all staff, including all attorneys, legal fellows, interns and support staff. We employ a variety of electronic tools to assist staff in keeping contemporaneous

time records of their work on cases in litigation and on all other matters. During the course of this litigation, it was my responsibility to administer our primary timekeeping program and to ensure that staff who use alternative electronic resources to record their time do so in a manner that is retrievable and compatible with our primary system. All staff at SCSJ are required to keep contemporaneous time records, including administrative staff members, and those records are reviewed by their supervisors.

13. Allison Riggs is a senior attorney at the Southern Coalition for Social Justice, where her practice focuses almost exclusively on voting rights.

14. Ms. Riggs is a 2009 graduate of the University of Florida Levin College of Law and was admitted to practice law in the State of North Carolina in August of 2009. She is admitted to practice in the Middle and Eastern District Courts in North Carolina, the Fourth Circuit Court of Appeals, and has been a member of the Supreme Court Bar since 2012. Her resume is attached as Exhibit C.

15. Ms. Riggs has extensive experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and the U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

16. Ms. Riggs has argued voting rights cases in the 4th Circuit and Florida Supreme Court.

17. Ms. Riggs has written briefs for the United States Supreme Court in approximately a dozen cases to date, all of which involved voting rights issues.

18. Overall, Ms. Riggs has been counsel in over 25 voting rights cases, including four cases litigating statewide redistricting plans following the 2010 decennial census—Texas, North

Carolina, Tennessee and Florida. Her resume, attached as Exhibit C, includes a list of the voting rights cases she has litigated.

19. Ms. Riggs has additionally been a visiting professor and guest lecturer at Duke University, North Carolina Central University, University of North Carolina, and Harvard University law schools. She has been a presenter at many continuing legal education programs, conferences, and forums.

20. George Eppsteiner was a staff attorney at the Southern Coalition for Social Justice from August 2014 to August 2016, and his practice with us focused almost exclusively on voting rights.

21. Mr. Eppsteiner is a 2010 graduate of the University of Florida Levin College of Law, was admitted to practice law in Florida in September 2010 and was admitted to practice law in the State of North Carolina in August 2011. He is admitted to practice law in the Middle and Eastern District Courts in North Carolina, the Fourth Circuit Court of Appeals and the U.S. Supreme Court. His resume is attached as Exhibit D.

22. Mr. Eppsteiner has experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and the U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

23. Emily Seawell is a staff attorney at the Southern Coalition for Social Justice, where her practice focuses almost exclusively on voting rights.

24. Ms. Seawell is a 2015 graduate of Elon University School of Law and was admitted to practice law in North Carolina in 2016. She is admitted to practice law in the Middle and Eastern District Courts in North Carolina. Her resume is attached as Exhibit E.

25. Ms. Seawell has experience representing plaintiffs in voting rights cases in state and federal courts, including cases brought under the Voting Rights Act of 1965 and the U.S. Constitution, and cases raising state statutory and constitutional voting rights claims.

26. Ms. Seawell has assisted in drafting briefs for the United States Supreme Court in several cases to date, all of which involved voting rights issues.

27. Overall, Ms. Seawell has been counsel or has supported counsel of record in nine voting rights cases, including five redistricting cases. Her resume, attached as Exhibit E, includes a list of the voting rights cases she has litigated.

28. Ms. Seawell has additionally been a guest speaker at Elon and Campbell law schools in North Carolina, and has been a presenter at a number of community forums.

A. Requested Attorneys' Fees

29. Below is a table summarizing all the time that Plaintiffs are seeking fees for, and shows the 10% discount in time taken for time spent on the Plaintiffs' racial gerrymander claim.

Southern Coalition for Social Justice - Wright/RWCA - Attorneys' Fees Summary

Billable Time

Wright Case Only

Timekeeper	Position	Hours	Hourly Rate	Total Amount Billed
Anita Earls	Executive Director	264.68	\$ 550	\$ 145,574.00
Allison Riggs	Senior Attorney	66.02	\$ 400	\$ 26,408.00
Christopher Ketchie	Policy Analyst	67.25	\$ 225	\$ 15,131.25
Emily Seawell	Legal Fellow (unlicensed)	11.4	\$ 200	\$ 2,280.00
Jeremy Collins	Legal Fellow (unlicensed)	21.75	\$ 200	\$ 4,350.00
Christopher Heaney	Legal Fellow (licensed)	5.36	\$ 250	\$ 1,340.00

TOTAL - Wright only 436.46 \$ 195,083.25

RWCA Case Only

Timekeeper	Position	Hours	Hourly Rate	Total Amount Billed
Anita Earls	Executive Director	47.85	\$ 550	\$ 26,317.50

Emily Seawell	Legal Fellow (unlicensed)	6.58	\$ 200	\$ 1,316.00
Joseph Crupi	Legal Intern (unlicensed)	8.25	\$ 150	\$ 1,237.50

TOTAL - RWCA only 62.68 \$ 28,871.00

RWCA/Wright - Consolidated

Timekeeper	Position	Hours	Hourly Rate	Total Amount Billed
Anita Earls	Executive Director	390.8	\$ 550	\$ 214,940.00
Allison Riggs	Senior Attorney	389.11	\$ 400	\$ 155,644.00
George Eppsteiner	Staff Attorney	110.3	\$ 300	\$ 33,090.00
Emily Seawell	Staff Attorney (post-licensure)	145.74	\$ 250	\$ 36,435.00
Emily Seawell	Legal Fellow (unlicensed)	175.89	\$ 200	\$ 35,178.00
Christopher Ketchie	Policy Analyst	23	\$ 225	\$ 5,175.00
Dr. Fred McBride	Senior Policy Analyst	108.2	\$ 225	\$ 24,345.00
Jaclyn Maffetore	Legal Extern (unlicensed)	44.3	\$ 150	\$ 6,645.00

TOTAL - Consolidated cases 1387.34 \$511,452.00

Total Billable Amount \$ 735,406.25

Less 10% Reduction of Hours in RWCA for Unsuccessful Claim (\$54,032.30)

Total Amount Claimed \$ 681,373.95

30. Plaintiffs are seeking payment for 264.68 hours of my time in the *Wright* case only, for 43.07 hours of my time in the *RWCA* case only, and for 351.70 hours in the consolidated cases. My time records were kept contemporaneously with the work performed. Pre-litigation work in *Wright* began on March 20, 2013 when clients first contacted me about the proposed legislation to change the method of electing the Wake County Board of Education, and the *Wright*-only work included briefing and argument on Defendants' motion to dismiss in the trial and appeals courts. Pre-filing work in *RWCA* began on March 6, 2015, and included work relating only to *RWCA* until shortly before the cases were consolidated in September 2015 for an expedited discovery period and three-day trial. The cases remained consolidated on appeal and

during the remedy phase. Plaintiffs' counsel are not double billing for time spent on the two cases, but instead billing for their total time spent. The claimed amount is the total lodestar amount—determined by multiplying my hourly rate of \$550 per hour by the hours I reasonably and necessarily worked on this litigation. I have attached a table summarizing all SCSJ hours in this case as Exhibit F, along with the detailed time records for each timekeeper.

31. In the course of this litigation, I have served as a lead litigator and trial counsel. My work in representing all Plaintiffs consisted of advising my clients during the legislative process; legal research; trial strategizing; witness preparation; examining and cross-examining witnesses at trial; drafting and reviewing discovery requests and responses; communicating with opposing counsel; interacting with and directing the work of experts; attending hearings and trial; bearing primary responsibility for drafting and arguing remedial briefs and motions; and much more.

32. Given my experience in voting rights litigation, I am requesting an award of \$550 per hour for my work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of my years of experience and specialized skill.

33. I possess the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. I have frequently recruited and directed the work of both quantitative and qualitative social science experts in support of voting rights claims. Given this necessary knowledge and experience, my claimed hourly rate is warranted and reasonable.

34. Plaintiffs are claiming \$182,052 in attorneys' fees for the work Allison Riggs performed in this litigation in these consolidated cases. Her time was kept contemporaneously with the work she performed. The claimed amount is the total lodestar amount—determined by

multiplying her hourly rate of \$400 per hour by the 455.13 hours she reasonably and necessarily worked on this litigation. A table summarizing her hours in this case is attached as Exhibit F.

35. In the course of this litigation, Ms. Riggs has served as a primary litigator and trial counsel. Her work in representing all Plaintiffs consisted of legal research; trial strategizing; witness preparation; examining and cross-examining witnesses at trial; drafting and reviewing discovery requests and responses; communicating with opposing counsel; interacting with and directing the work of experts; coordinating witnesses and exhibits; attending hearings and trial; bearing primary responsibility for drafting Plaintiffs' trial brief and proposed findings of fact and conclusions of law; and much more.

36. Given Ms. Riggs' experience in voting rights litigation, she is requesting an award of \$400 per hour for her work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of her experience and skill.

37. Ms. Riggs possesses the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. She has frequently recruited and directed the work of both quantitative and qualitative social science experts in support of voting rights claims. Given this necessary knowledge and experience, her claimed hourly rate is warranted and reasonable.

38. Plaintiffs are claiming \$33,090 in attorneys' fees for the work George Eppsteiner performed in this litigation in these consolidated cases. Mr. Eppsteiner's time was kept contemporaneously with the work performed. The claimed amount is the total lodestar amount—determined by multiplying his hourly rate of \$300 per hour by the 110.3 hours he reasonably and necessarily worked on this litigation. A table summarizing his hours in this case is attached as Exhibit F.

39. In the course of this litigation, Mr. Eppsteiner served as a secondary litigator and trial counsel. His work in representing all Plaintiffs consisted of legal research; trial strategizing; witness preparation; examining and cross-examining witnesses at trial; attending hearings and trial; and more.

40. Given Mr. Eppsteiner's experience in voting rights litigation, he is requesting an award of \$300 per hour for his work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of his experience and skill.

41. Mr. Eppsteiner possesses the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. Given this necessary knowledge and experience, his claimed hourly rate is warranted and reasonable.

42. Plaintiffs are claiming \$36,435 in attorneys' fees for the work Emily Seawell performed in this litigation in these consolidated cases. Her time records were kept contemporaneously with the work performed. The claimed amount is the total lodestar amount—determined by multiplying her hourly rate of \$250 per hour by the 145.74 hours she reasonably and necessarily worked on this litigation. A table summarizing her hours in this case is attached as Exhibit F.

43. In the course of this litigation, Ms. Seawell served as litigation support for trial counsel. Her work on behalf of all Plaintiffs consisted of advising clients during the legislative process; legal research; drafting and reviewing discovery requests and responses; communicating with opposing counsel; coordinating witnesses; attending hearings and trial; bearing secondary responsibility for drafting Plaintiffs' trial brief and proposed findings of fact and conclusions of law; and much more.

44. Given Ms. Seawell's experience in voting rights litigation, she is requesting an award of \$250 per hour for her work in this litigation. In my opinion, this reflects the usual and customary rate for an attorney of her experience and skill.

45. Ms. Seawell possesses the requisite understanding of relevant evidence to prosecute claims under the Fourteenth Amendment. Given this necessary knowledge and experience, her claimed hourly rate is warranted and reasonable.

46. Plaintiffs are claiming a combined \$51,109 in fees for the work of Emily Seawell and Jeremy Collins, who spent 193.87 and 21.75 hours on this action, respectively, at a rate of \$200/hour as law clerks for the Southern Coalition for Social Justice before taking the North Carolina bar exam; Jaclyn Maffetore, who spent 44.3 hours on this action at a rate of \$150/hour as a legal intern for the Southern Coalition for Social Justice; as well as Christopher Heaney, who spent 2.175 hours on this action at a rate of \$250/hour as a law clerk after passing the North Carolina bar exam. The law clerks' hours were devoted to tasks such as client and witness management, legal research, drafting legal documents, and providing pretrial, trial, and appellate support. Tables summarizing Ms. Seawell, Mr. Collins, Ms. Maffetore, and Mr. Heaney's hours in this case are attached as Exhibit F. In my opinion, their hourly rates reflect the usual and customary rate for law clerks of their experience and skill.

47. Plaintiffs are am claiming a combined \$44,651.25 in fees for the work of Dr. Frederick McBride and Christopher Ketchie, who were employed by Plaintiffs as specialists in geographic information systems. Dr. McBride spent 108.2 hours on this consolidated action at an hourly rate of \$225, and Mr. Ketchie spent 90.25 hours on this action at an hourly rate of \$225. Those hours were devoted to tasks such as researching demographics and maps, constructing shapefiles and preparing block assignment files for the challenged redistricting

plans, geocoding incumbent residences, analyzing precinct splits, analyzing election returns, preparing work product for Defendant's requests for production of documents, and assisting expert witnesses in understanding the case and preparing their analyses. Tables summarizing Dr. McBride and Mr. Ketchie's hours in this case are attached as Exhibit F. In my opinion, their hourly rates are reasonable for policy analysts of their experience and skill.

48. Plaintiffs' counsel and support staff worked carefully together to ensure that efforts were not duplicated, and we conferred regularly by phone with opposing counsel to divide up and streamline the joint trial preparation we undertook in this litigation to ensure that our efforts and trial were efficient.

49. Using the factors outlined by the Fifth Circuit in *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 714, 717 (5th Cir. 1974), our requested awards are appropriate. As discussed in more detail in Plaintiffs' Motion for Attorneys' Fees, Expert Fees, and Litigation Expenses, this litigation involved extremely complicated legal and factual issues. My staff's expertise in voting rights, the history of discrimination in voting, and complex civil rights litigation was necessary to advance the interests of our clients in this litigation. The obligations imposed by this litigation—briefing requirements for trial and during the remedy phase, time spent in trial and hearings, and more—had a great impact on our ability to take on other voting rights cases. The time limitations imposed by the circumstances in this expedited litigation—tight deadlines for briefing and impending election deadlines, for example—further lend support to our claims for fees.

50. This case was very difficult and complicated, and involved balancing interests between different racial and ethnic groups. The case involves Fourteenth Amendment issues yet to be resolved by the United States Supreme Court.

51. As fully explained in the Memorandum in Support of Motion for Attorney Fees, Expert Fees, and Litigation Expenses, I have exercised appropriate billing judgment and limited the hours for which Plaintiffs seek compensation. To account for *RWCA* Plaintiffs' limited success on their racial gerrymandering claim, I have applied a ten percent reduction to the hours for which Plaintiffs seek compensation beginning with the time the *RWCA* complaint was drafted. Taking into account both reductions, I have written off a total of \$54,032.30 in fees.

B. Reasonable Expert Fees

52. Plaintiffs are also claiming a combined \$32,813.42 in expert fees paid to the Plaintiffs' expert witnesses Anthony Fairfax and Dr. Jowei Chen. A table summarizing the claimed expert fees is attached as Exhibit A to the Declaration of Allison J. Riggs dated November 23, 2016.

53. Mr. Fairfax owns and runs a demographic analysis firm that provides Census-based analyses and services to clients across the southeastern United States. Mr. Fairfax charged \$2,000 for the production of his report and \$1,700 per day for the two days of trial work. Mr. Fairfax expended that time communicating with Plaintiffs' counsel, researching the challenged redistricting plans and demographics in Wake County, conducting a statistical analysis of those plans and demographics, performing quality control on his results, drafting and editing an expert report, and preparing and delivering testimony in support of his findings.

54. Dr. Chen is a professor at the University of Michigan who specializes in computer modeling and statistical analysis and who has provided expert services in a number of other redistricting matters. Dr. Chen spent 40 hours at an hourly rate of \$500, \$2,000 a day for three days of trial work, and \$1,413.42 in travel expenses. He expended this time communicating with Plaintiffs' counsel, researching the challenged redistricting plans and demographics in Wake

County, creating and running a series of statistical computer models to analyze the challenged redistricting plans, conducting a statistical analysis of those plans and demographics, performing quality control on his results, drafting and editing an expert report, and preparing and delivering testimony in support of his findings.

55. In my opinion, Mr. Fairfax and Dr. Chen's hourly rates for their services are reasonable in light of their expertise in redistricting matters, the prevailing market rates for experts of their caliber in voting rights cases, and the novelty of the claims and time constraints under which they were asked to perform.

C. Reasonable Litigation Expenses and Costs

56. Plaintiffs are also claiming \$56,831.34 in costs associated with the litigation. Of that, \$47,773.66 is for non-taxable costs, including travel expenses, expert fees and the like. The remaining \$9,057.68 is for taxable costs. A table summarizing the claimed taxable and non-taxable costs is attached as Exhibit A to the Declaration of Allison J. Riggs.

57. In my opinion, and as detailed in Plaintiffs' Memorandum in Support of Motion for Attorney Fees, Expert Fees, and Litigation Expenses and Memorandum in Support of Application for Costs, these expenses were reasonably incurred in the course of providing effective representation to Plaintiffs, and Plaintiffs' counsel made appropriate efforts throughout the litigation to reduce unnecessary expenses.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 23, 2016.



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EXHIBIT A

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U.S. Supreme Court

1. *Dickson v. Rucho*, 135 S. Ct. 1843; 191 L. Ed. 2d 719; (2015). On remand at *Dickson v. Rucho*, 368 N.C. 270, 781 S.E. 2d 404 (2015).
2. *Shaw v. Hunt*, 517 U.S. 899; 116 S. Ct. 1894; 135 L. Ed. 2d 207 (1996); 861 F. Supp. 408 (E.D. N.C. 1994).
3. *Reno v. Bossier Parish Sch. Bd.*, 528 U.S. 320; 120 S. Ct. 866; 145 L. Ed. 2d 845 (2000).

U.S. Courts of Appeals

4. *League of Women Voters v. North Carolina*, 831 F.3d 204, 237 (4th Cir. 2016).
5. *LaRoque v. Holder*, 679 F.3d 905; (D.C. Cir. 2012) cert. denied by *Nix v. Holder*, 2012 U.S. LEXIS 8809 (U.S., Nov. 13, 2012).
6. *N.C. Right to Life Comm. Fund v. Leake*, 524 F.3d 427 (4th Cir. 2008), cert. denied *Duke v. Leake*, 2008 U.S. LEXIS 8014 (U.S., Nov. 3, 2008).
7. *Hayden v. Pataki*, 449 F.3d 305 (2nd Cir. 2006).
8. *Muntaqim v. Coombe*, 449 F.3d 371 (2nd Cir. 2006).
9. *Hall v. Virginia*, 385 F.3d 421 (4th Cir. 2004), aff'g 276 F. Supp. 2d 528 (E.D. Va. 2003), cert. denied, 2005 U.S. LEXIS 2973 (U.S., Apr. 4, 2005).
10. *Metts v. Murphy*, 363 F.3d 8 (1st Cir. 2004), rev'g *Metts v. Almond*, 217 F. Supp. 2d 252 (R.I. 2002).
11. *Johnson v. Hamrick*, 296 F.3d 1065 (11th Cir. 2002); 115 F. Supp.2d 1355 (N.D. Ga. 2001).
12. *Wilson v. Minor*, 220 F.3d 1297 (11th Cir. 2000).
13. *Cannon v. Durham County Bd. of Elections*, 129 F.3d 116, (4th Cir. 1997) (table) opinion at 1997 U.S. App. LEXIS 31794.
14. *Gause v. Brunswick County*, 92 F.3d 1178, (4th Cir. 1996) (table) opinion at 1996 U.S. App. LEXIS 20237.
15. *Republican Party v. North Carolina State Bd. of Elections*, 27 F.3d 563 (4th Cir. 1994) (table) opinion at 1994 U.S. App. LEXIS 14961.

16. *Moore v. Beaufort County*, 936 F.2d 159 (4th Cir. 1991).

U.S. District Courts

17. *Covington v. N.C.*, 316 F.R.D. 117 (M.D.N.C. 2016).

18. *George v. Haslam*, 112 F. Supp. 3d 700 (M.D. Tenn. 2015).

19. *Dean v. Leake*, 550 F. Supp. 2d 594 (E.D.N.C. 2008), *appeal dismissed* 2008 U.S. LEXIS 6697 (U.S., Oct. 6, 2008).

20. *Johnson v. Bush*, 214 F. Supp. 2d 1333 (S.D. Fla. 2002); *aff'd in part and rev'd in part by*, *Johnson v. Governor of Fla.*, 2003 U.S. App. LEXIS 25859 (11th Cir. Fla., Dec. 19, 2003).

21. *Ward v. Columbus County*, 782 F. Supp. 1097 (E.D. N.C. 1991).

22. *McGhee v. Granville County*, 860 F.2d 110 (4th Cir. 1988).

23. *NAACP-Greensboro Branch v. Guilford County Bd. of Elections*, 858 F. Supp. 2d 516 (M.D. N.C. 2012).

EXHIBIT B

ANITA S. EARLS

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PROFESSIONAL SUMMARY

A civil rights attorney with 28 years of experience addressing structural racism, protecting minority voting rights, and advocating for fair and equitable opportunities for all people. An innovative and passionate leader committed to racial justice in the south, with extensive experience in North Carolina and broad connections nationally among social justice practitioners and philanthropic professionals.

EDUCATION

Yale Law School, New Haven, Connecticut.
J.D., January, 1988. Senior Editor, Yale Law Journal.

Thomas J. Watson Fellowship, 1981-1982.
Studying cooperative work organizations and the role of women in Chekereni Ujamaa Village, Tanzania; and the cooperative movement in Italy and England.

Williams College, Williamstown, Massachusetts.
B.A. Magna Cum Laude, June 1981. Major in Political Economy (Honors), and Philosophy. Honors and Awards: Phi Beta Kappa; Lehman Scholarship; National Achievement Scholarship.

EXPERIENCE

Southern Coalition for Social Justice, Durham, N.C.
Executive Director, September 2007 to present.

Founder and Director of non-profit advocacy organization engaged in community lawyering with a human rights perspective to empower communities of color and economically disadvantaged communities in the south.

- Established innovative and multi-disciplinary program of advocacy across interrelated issue areas grounded in strong partnerships with community-based organizations.
- Raise and manage \$1.3 million budget annually, lead 12 full-time staff.
- Litigate precedent-setting voting rights cases in state and federal court.
- Convene the Fair Redistricting Collaborative, and Southern Leadership for Voter Engagement, both regional coalitions of voting rights advocates; facilitate New Southern Strategy Coalition to address collateral consequences of convictions; co-lead national working group of voting rights attorneys.
- Lead strategic planning and assessment of program effectiveness.
- Foster internal racial equity initiative, and promote staff development generally.
- Support SCSJ's Board of Directors, predominantly people of color, consistent with the organization's mission of being community-led.

Duke University, Durham, N.C.
Visiting Research Fellow, Social Science Research Institute, Center for Race, Ethnicity and Gender in the Social Sciences, 2009 – 2012. Conducting research on census and redistricting issues. Partnered with key faculty to conduct the Community Census and Redistricting Institute in 2010.

Adjunct Professor, spring 2004 & 2006. Taught undergraduate seminars for the African and African-American Studies Department on civil rights litigation topics.

University of North Carolina Law School, Chapel Hill, N.C.

Adjunct Professor, fall 2006, spring 2008. Taught two upper level seminars – Constitution and the Political Process; and Race, Residence & Municipal Exclusion, both involving rigorous writing experience for students.

UNC Center for Civil Rights, Chapel Hill, N.C.

Director of Advocacy, August 2003 to September 2007. Developed and supervised implementation of civil rights advocacy program, including complex litigation, policy analysis, public education and other activities in voting rights, education and community development law.

Lawyers' Committee for Civil Rights Under Law, Washington, D.C.

Director, Voting Rights Project and Coordinator, Police Misconduct Initiative, December 2000 to July 2003. Responsible for major civil rights litigation, public education efforts, and related public policy advocacy. Led a multi-organization litigation team challenging the disenfranchisement of voters in the 2000 general election in Florida, *NAACP v. Harris*; argued successfully *en banc*

University of Maryland Law School, Baltimore, MD

Adjunct Professor, spring 2002. Taught Voting Rights Seminar to 2nd and 3rd year students, supervised analytical writing assignments.

Civil Rights Division, U.S. Department of Justice, Washington, D.C.

Deputy Assistant Attorney General for Civil Rights, April 1998 to August 2000. Participated in policy decisions and directed the Division's litigation efforts. Responsible for Voting, Coordination and Review, Educational Opportunities and Disability Rights sections of the Civil Rights Division. Key policy achievements included revisions to the Department's Guidance under Section 5 of the Voting Rights Act, new Title VI regulations for all federal agencies, Guidance on federal grantees' responsibilities to serve limited English proficient members of the public, and Guidance on the aggregation of multi-racial census data for civil rights enforcement purposes.

Ferguson, Stein, Wallas, Adkins, Gresham & Sumter, Charlotte, N.C.

Partner, January 1993 to April 1998.

Associate, January 1988 to December 1992. Trial lawyer in civil rights litigation in state and federal court including voting rights, employment discrimination, and police misconduct cases; criminal defense; general litigation. Represented intervenors in *Shaw v. Hunt* voting rights litigation.

The Nation Institute, New York, N.Y.

Robert Masur Fellow in Civil Liberties, March to September 1987. Research and writing on civil rights and constitutional issues.

Sheehan & Solomon, New Haven, CT

Intern, Summer 1986. Student-Funded Fellowship position; assisted civil rights litigation involving sexual harassment claims and represented victims of domestic violence.

Professor Drew S. Days, Yale Law School.

Research Assistant, Summer 1985. Developed, organized and edited materials for Canadian Human Rights course.

Hallmark, Carter & Atkinson, Solicitors, London, U.K.

Caseworker/Secretary, Jan. 1983 - June 1985. Initially helped organize legal aid practice. Assumed responsibility for matrimonial and domestic violence cases including interviewing clients, preparing papers, and attending court. Investigated claims and prepared briefs in housing, criminal and social security cases.

PUBLICATIONS

“Voting Rights in North Carolina: 1982-2006,” 17 S. Cal. Rev. L. & Soc. Just. 577 (2008) (co-authors Emily Wynes & LeeAnne Quatrucci).

“Voting Rights in Virginia: 1982-2006,” 17 S. Cal. Rev. L. & Soc. Just. 761 (2008) (co-authors Millonzi, Seliski & Dixon).

“Introduction: Advancing minority voting rights : how do we get from here to there?” in Voting Rights and Minority Representation, 1 (D. Bositis, ed. 2006).

“Equal Effects,” Legal Affairs, Nov.-Dec. 2003 at 22-23.

"Where You Counted?--Civil Rights and the 1990 Census," in One Nation, Indivisible: The Civil Rights Challenge for the 1990's, 352 (R. Govan & W. Taylor, eds. 1989) (co-author, J. Steinberg).

Note, "Petitioning and the Empowerment Theory of Practice," 96 Yale L.J. 569 (1987).

PROFESSIONAL & COMMUNITY ACTIVITIES

Faculty and Advisory Board Member, Shriver Center Racial Justice Training Institute (2014 to Present).

Board Member, Blueprint North Carolina (2013 to Present).

Board Member, Beloved Community Center (2013 to Present).

Fellow, Rockwood Year-Long Leading from the Inside Out Program (2010 to 2011).

Board Member, Durham Economic Resource Center (2010 to 2012).

Member, North Carolina State Board of Elections (July 2009 to September 2011).

Secretary, North Carolina Equal Access to Justice Commission (2006 to 2014).

Volunteer, Legal Information Service, The Women's Center, Chapel Hill, N.C. (2003 to 2009).

Board President, Legal Services of Southern Piedmont (1997 to 1998).

Board Chair, Chemical Dependency Center of Charlotte-Mecklenburg (1997 to 1998).

Member, Commission on Race Relations in the Legal Profession (1996 to 1998).

Board Member, ACLU of North Carolina (1995 to 1998).

EXHIBIT C

Allison Riggs
Senior Staff Attorney
Southern Coalition for Social Justice
1415 W. Highway 54, Suite 101
Durham, NC 27707
E-mail: Allison@southerncoalition.org
Phone: 919-323-3380 ext. 117
Fax: 919-323-3942

Vitae – Current as of November 2016

Education

2003 B.S. University of Florida
2006 M.A. University of Florida (in History)
2009 J.D. University of Florida Levin College of Law

Admissions

2009 State of North Carolina
2011 United States District Court for the Eastern District of North Carolina
2012 United States District Court for the Middle District of North Carolina
2014 United States Court of Appeals for the Fourth Circuit
2012 United States Supreme Court

Employment History

2009-2014 Staff Attorney
Southern Coalition for Social Justice
Durham, NC
2014 – present Senior Staff Attorney
Southern Coalition for Social Justice
Durham, NC

Voting Rights Cases

2016 – present – League of Women Voters of North Carolina v. Rucho
-Case No. 1:16-cv-1164 (M.D.N.C.)

-counsel for plaintiffs alleging that the 2016 remedial North Carolina congressional redistricting plan is an unconstitutional partisan gerrymander

2016 – present – *Howell v. McAuliffe*

-Case No. 160784 (Virginia Supreme Court)

-counsel for Virginia NAACP as amicus in support of petitioner in mandamus action challenging Governor McAuliffe's authority to restore the right to vote to Virginians with past felony convictions.

2015 – present – *Action NC v. Strach*

-Case No. 1:15-cv-01063 (M.D.N.C.)

-counsel for plaintiffs alleging violations by the North Carolina State Board of Elections, Department of Motor Vehicles, and Department of Health and Human Services of the National Voter Registration Act

2015 – present – *Raleigh Wake Citizens Association v. Wake County Board of Elections*

-Case No. 5:15-cv-156 (E.D.N.C.)

-counsel for plaintiffs challenging a local bill restructuring the Wake County Board of County Commissioners, alleging violations of the Equal Protection Clause.

2015 – present – *City of Greensboro v. Guilford County Board of Elections*

-Case No. 1:15-CV-559 (M.D.N.C.)

-counsel for plaintiffs challenging a local bill restructuring the Greensboro City Council and removing from the city the ability to change its method of election via referendum, alleging violations of the Equal Protection Clause; injunction issued in July 2015.

2013 – present – *LWV NC v. North Carolina*

-Case No. 1:13-cv-660 (M.D.N.C.)

-counsel for plaintiffs challenging the state's omnibus voter suppression law, including the repeal of early voting, repeal of same day registration and out of precinct voting, alleging violations of the U.S. Constitution and the Voting Rights Act of 1965.

2013 – present – *Currie v. State of North Carolina*

-Case No. 13-CVS-1419 (Orange County Superior Court, North Carolina)

-counsel for plaintiffs challenging the state's voter ID law, alleging violations of the state constitution.

2013 – present – *Wright v. North Carolina*

-Case No. 5:13-cv-607 (E.D.N.C.)

-counsel for plaintiffs challenging a local bill restructuring the Wake County Board of Education, alleging violations of the Equal Protection Clause.

2011- present - *Perez v. Perry*

-Case No. 5:11-cv-00360 (W.D. Tx)

-counsel for Plaintiffs Texas State Conference of NAACP Branches, arguing that the enacted 2011 plans for Congress and State House in Texas violated Section 2 of the Voting Rights Act and the equal protections of the Fourteenth Amendment.

2011- present – *Dickson, et al. v. Rucho, et al./NC NAACP et al., v. North Carolina, et al.*

-Case Nos. 11-CVS-16896 and 11-CVS-16940 (pending in the North Carolina Supreme Court)
-counsel for plaintiffs, the North Carolina NAACP, other civil rights organizations, and numerous state residents challenging under the federal and state constitutions the 2011 enacted redistricting plans for North Carolina congressional, state house and state senate districts

2015 – 2016 – *Shapiro v. McManus*

-Case No. 14-990 (United States Supreme Court)
-counsel for Amicus Virginia State Conference of NAACP Branches, arguing that a single judge hearing a redistricting case improperly dismissed the case, without referring it to the three-judge panel required by law.

2015 – 2016 – *Personhuballah v. Alcorn*

-Case No. 3:13-cv-00678 (E.D. Va.)
-counsel for Virginia NAACP in submitting plan as a non-party to the special master developing a remedial plan following the invalidation of congressional district invalidated as a racial gerrymander; counsel for Virginia NAACP as amicus in the United States Supreme Court in support of the decision of the court below.

2015 – 2016 – *Harris v. Arizona Independent Redistricting Commission*

-Case No. 14-232 (United States Supreme Court)
-counsel for Amicus Southern Coalition for Social Justice arguing that partisanship should not be allowed to justify redistricting plan population deviations of up to 10%, and highlighting for the Court examples of problems that such an exception would engender.

2014 – *Morton v. State of North Carolina*

-Case No. 14-cv-013294 (Wake County Superior Court, North Carolina)
-counsel for plaintiffs seeking judicial review of an arbitrary and capricious early voting plan for Lincoln County, NC.

2011-2013 - *Texas v. United States*

-Case No. 5:11-cv-001303 (D.D.C.)
-counsel for Defendant-Intervenor Texas State Conference of NAACP Branches, successfully arguing that the enacted 2011 plans for Congress, State House and State Senate in Texas violated Section 5 of the Voting Rights Act.

2012-2013 - *Shelby County, Alabama v. Holder*

-570 U.S. _____, 2013 U.S. LEXIS 4917 (United States Supreme Court, June 25, 2013)
-counsel for amicus political science and law professors, detailing for the court the vast amounts of empirical evidence that justify the Section 5 of the Voting Rights Act coverage formula reauthorized by Congress in 2006.

- 2010 – 2012 - *Nix v. Holder*
 -133 S. Ct. 610 (United States Supreme Court, November 13, 2012)
 -counsel for Defendant-Intervenor North Carolina State Conference of NAACP Branches, defending the constitutionality of Section 5 of the Voting Rights Act in the D.D.C. and United States Supreme Court.
- 2012 – *NAACP v. Duplin County, NC*
 -Case No. 88-cv-7 (E.D.N.C.)
 -counsel for plaintiffs NC NAACP and Duplin County NAACP, successfully contesting dilutive modification of a consent decree that was put into place to provide black voters in the county with the opportunity to elect members to the Board of County Commission and Board of Education.
- 2012 – *Holmes v. Lenoir County, NC, Board of Education*
 -Case No. 86-120-cv-4 (E.D.N.C.)
 -counsel for plaintiffs, individual black voters in Lenoir County, NC, successfully contesting dilutive modification of a consent decree that was put into place to provide black voters in the county with the opportunity to elect members to the Board of Education.
- 2012 – *Porter, et al. v. Stewart, et al.*
 -Case No. 5:88-cv-950 (E.D.N.C.)
 -counsel for individual African-American voters in Harnett County, North Carolina, seeking modification of a voting rights consent decree (governing districts to elect members of the Board of County Commissioners and Board of Education) to allow for the continued protection of the voting rights of black voters in the county given population changes
- 2010 – *League of Women Voters v. Rokita*
 -929 N.E.2d 758 (Indiana Supreme Court, June 30, 2010)
 -counsel for amicus civil rights organizations, arguing that the Privileges and Immunities Clause of the Indiana constitution provides protections to voters in Indiana that exceed the protections provided by the federal constitution
- 2010 - 2011 – *Libertarian Party of NC v. North Carolina*
 -365 N.C. 41 (North Carolina Supreme Court, March 11, 2011)
 -counsel for amicus civil rights organizations, highlighting the policy reasons that justify open and easy ballot access for third-party candidates and parties
- 2012 - *Greensboro Branch of the NAACP v. Guilford County, NC, Board of Elections, et al.*
 -Case No. 1:12-cv-111 (M.D.N.C.)
 -counsel for plaintiffs Greensboro Branch of the NAACP and individual voters, successfully challenging on equal protection grounds a redistricting plan for the Guilford County Board of County Commissioners that would have effectively deprived a swath of county citizens of any representation for two years
- 2012 – *In re: 2012 Joint Resolution of Legislative Apportionment*
 -Case No. SC12-460, 89 So. 3d 872 (Florida Supreme Court, April 27, 2012)

-counsel for Florida State Conference of NAACP Branches, opposing on state constitutional grounds the state's enacted redistricting plan for the State Senate and arguing in front of the Florida Supreme Court

2012 – 2015 – *Romo, et al. v. Detzner, et al.*

-Case Nos. 2012-CA-000412 and 2012-CA-000490 (Leon County, FL, Circuit Court)

-counsel for Defendant-Intervenor Florida State Conference of NAACP Branches, defending against state constitutional challenge a district which enables black voters in north-central Florida to elect their candidate of choice to U.S. Congress

2012 - 2014 - *Moore, et al. v. Haslam, et al.*,

-Tennessee Court of Appeals No. M2013-00811-COA-R3-CV

-counsel for plaintiffs, residents of Shelby County, TN, challenging under state constitution the Tennessee state senate redistricting plan enacted in 2011

Publications

Allison J. Riggs, *Felony Disenfranchisement in Florida: Past, Present and Future*, 28 ST. JOHN'S J. C.R. & ECON. DEV. 111 (2015).

Allison J. Riggs & Jack E. Riggs, *Epilepsy's Role in the Historical Differentiation of Religion, Magic, and Science*, 46 EPILEPSIA 452 (2005).

Allison J. Riggs & Jack E. Riggs, "Guessing It Right", John A. Simpson, and Myasthenia Gravis: the Role of Analogy in Science. 62 NEUROLOGY 465 (2004).

Allison J. Riggs, RJ Millechia & Jack E. Riggs, *The Contributions of Lavoisier, Carnot, and Mayer to Understanding Heat Illness*, 75 AVIATION, SPACE, AND ENVIRONMENTAL MEDICINE 916 (2004).

Jack E. Riggs & Allison J. Riggs, *Prominent 59-year-old British neurosurgeon, Victor Horsley, succumbs to heatstroke while serving with allied troops in Iraq*, 18 BRITISH JOURNAL OF NEUROSURGERY 375 (2004).

National and/or Notable Invited Voting Rights Presentations

2015 – NAACP Legal Defense & Education Fund, Inc., (LDF) Annual Civil Rights Training Institute

-panelist, "A Change is Gonna Come: Advocating to Preserve and Advance the Right to Vote"

-Airlie Conference Center, Warrenton, VA

-October 23, 2015

2015 – Voto Latino Power Summit

-panelist, "Battle of the Ballot: Latinos and the Fight for Voting Rights"

-Charlotte, NC

-September 29, 2015

- 2012 - Congressional Black Caucus Institute
 - panelist: “Post Reconstruction 2012: Voter Suppression/I.D. Laws”
 - Tunica, MS
 - August 11, 2012

- 2011 - Congressional Black Caucus Institute
 - panelist: “Redistricting: Reapportioning and other Barriers to Participation – Having a Seat at the Table”
 - Tunica, MS
 - August 13, 2011

- 2014 – NAACP National Convention CLE
 - panelist: “Voter Suppression after the Shelby Decision”
 - Las Vegas, NV
 - July 2014

- 2013 - NAACP National Convention CLE
 - panelist: “Voting Rights After the Shelby Decision”
 - Orlando, FL
 - July 14, 2013

- 2012 - Hispanic National Bar Association
 - panelist: “Voting Rights and Voter Suppression Efforts”
 - Seattle, WA
 - August 23, 2012

- 2013 - Federalist Society event (voter ID)
 - panelist: “Voter ID in North Carolina,” with Hans Von Spakovsky, John Fund and Bob Hall
 - Raleigh, NC
 - February 6, 2013

- 2013 - Federalist Society event (Shelby County)
 - debater: “The Voting Rights Act and the Shelby County Case” with Roger Clegg
 - Durham, NC
 - March 26, 2013

- 2013 – North Carolina State House of Representatives Elections Committee
 - invited testimony: Invited Views on House Bill 589 (Voter Photo ID Requirement)
 - Raleigh, NC
 - March 13, 2013

- 2011 - Young Elected Officials Network National Convening
 - panelist: “Voting Reform and Redistricting: Meeting the Needs of an Increasingly Mobile Electorate and Protecting Communities of Interest”
 - Washington, D.C.
 - June 4, 2011

2010- Young Elected Officials Network Policy Academy: Redistricting and Immigration
-panelist: “In-Depth Redistricting Overview”
-Los Angeles, CA
-September 10, 2010

2010- Young Elected Officials Network National Convening
-panelist: “Redistricting for Fair Representation”
-Washington, D.C.
-May 15, 2010

2012 - Paul C. Perkins Bar Association
-presenter: “Election Protection and Voting Rights”
-Orlando, FL
-October 4, 2012

Exemplar National Media Work - Voting Rights

July 3, 2013, The Alan Colmes Show, Fox News Radio

July 2013 – Tell Me More, NPR

July 29, 2013 – The Rachel Maddow Show, MSNBC

June 30, 2013 – “Changes Loom for N.C. Electorate,” L.A. Times interview

August 12, 2014 – The Ed Show, MSNBC

February 12, 2016 – To the Point, NPR

May 1, 2016 – Politics Nation, MSNBC

Awards

July 2013 - National NAACP Legal Department – 2013 Foot Soldier Award

EXHIBIT D

EDUCATION

University of Florida, Fredric G. Levin College of Law

GPA: 3.63

Juris Doctor, cum laude

May 2010

- Top 12% of graduating class
- Florida Moot Court: *Board Member*; Journal of Law and Public Policy: *Executive Articles Editor*
- Book Awards: Juvenile Justice Law, Poverty Law
- Thesis: *The Death Penalty and Deterrence: An Inevitable Relationship with an Uncertain Effect*

University of Massachusetts Amherst, Isenberg School of Management

GPA: 3.96

B.S. Sport Management, B.A. Spanish, Commonwealth Honors College, summa cum laude

May 2007

- Valedictorian for primary major

ADMISSIONS

- **North Carolina Bar**, admitted August 2011; **Florida Bar**, admitted September 2010
- Eastern District of North Carolina, Middle District and Southern District of Florida Federal Courts
- United States Supreme Court

EXPERIENCE

United States Department of Justice, Civil Rights Division, Voting Section

August 2016 – present

Trial Attorney

Southern Coalition for Social Justice, Durham NC

August 2014-July 2016

Staff Attorney, Voting Rights

- Draft motions and briefs in complex voting rights cases
- Conduct depositions and participate in trial in numerous voting rights cases

Cranfill Sumner & Hartzog LLP, Raleigh, NC

March 2012-August 2014

Associate in litigation defense group for one of North Carolina's largest law firms

- Represent municipalities, school districts, individuals, and corporations in North Carolina federal and state courts regarding professional liability, business law, employment, and negligence claims.
- Compose and argue regularly at dispositive motion and pre-trial hearings.
- Draft complex legal documents including constitutional briefs and termination agreements.

Macfarlane, Ferguson & McMullen, Tampa, FL

Sept. 2010-Feb. 2012

Associate in litigation group for Tampa's oldest law firm

- Provided legal counsel to individuals, corporations, and non-profit organizations in commercial litigation, criminal, civil rights, and appellate areas.
- Assisted in all aspects of litigation process including client interviews, discovery, witness depositions, motion drafting and argument, and trial.
- Drafted pleadings and briefs including criminal First Amendment appeal and bankruptcy appeal.

Public Defender Clinic, University of Florida, Gainesville, FL

Aug. 2009-Dec. 2009

Certified Legal Intern for 8th Circuit – Office of the Public Defender, State of Florida

- Represented indigent defendants in all phases of criminal cases in the state of Florida.

Southern Legal Counsel, Gainesville, FL

Aug. 2009-May 2010

Center for Governmental Responsibility Public Service Fellow for public interest law firm

- Researched and wrote memorandums to support non-profit organization in federal civil rights claims under Individuals with Disabilities Education Act, 42 U.S.C. 1983, and Fair Housing Act.

UNC School of Government, Chapel Hill, NC

June 2009-Aug. 2009

Law Clerk for largest university-based local government research institute in the U.S.

- Drafted training materials for NC public defenders in pre-trial release and domestic violence cases.
- Composed education law article regarding implications of student searches in NC public schools.

U.S. Department of Justice, United States Attorney's Office

June 2008-Aug. 2008

4432 Manns Chapel Rd. Chapel Hill, NC 27516

P: 508-654-6888 | E: geppstei@gmail.com

Extern for the Middle District of Florida, Ft. Myers, FL.

- Drafted motions in limine and legal research memorandums for federal criminal actions.

PRO BONO

- Co-counsel with the Southern Coalition for Social Justice in election law claim.
- Member of the Legal Committee for the ACLU of North Carolina to advise Legal Director regarding current litigation and to approve engagement in statewide criminal and civil litigation.

EXHIBIT E

Emily E. Seawell

810 W. Bessemer Ave. • Greensboro, N.C. 27408
eseawell@gmail.com • 336-740-4780

LEGAL WORK EXPERIENCE

Southern Coalition for Social Justice, Durham, North Carolina

Staff Attorney, February 2016 to present

- Engage in a full caseload of voting-related civil litigation and appeals in state and federal court; conduct legal and non-legal research; draft court documents and manage client relationships in legislative and legal matters involving redistricting, election administration, and the right to vote; address and respond to research requests from elected officials and community leaders on social justice-related topics; draft public communications; manage assignments for legal interns

Postgraduate Legal Fellow, May 2015 to February 2016

- Continued to provide full-time litigation support in voting rights cases, including conducting legal research, drafting court documents, and assisting in preparations for depositions, hearings, and trials; continued to engage with clients, elected officials, and the community on social justice-related topics; continued to track civil rights legislation

Legal Extern in Residence, January 2015 to May 2015

- Provided full-time litigation support in voting rights cases, including conducting legal research, drafting court documents, and assisting in preparations for depositions, hearings, and trials; engaged with clients, elected officials, and the community on social justice-related topics; tracked civil rights legislation

Humanitarian Immigration Law Clinic, Greensboro, North Carolina

Student Attorney, August 2014 to December 2014

- Interviewed prospective clients with humanitarian and immigration-related needs; managed case construction, conducted a comprehensive deposition, and drafted an affidavit and brief in support of an individual application for asylum; researched country conditions for inclusion in asylum applications; represented pro bono clients in federal administrative hearings before United States immigration officers

Elon University School of Law, Greensboro, North Carolina

Research Assistant to Patricia Carole Perkins, May 2013 to May 2015

- Conducted research and prepared class materials on best practices in legal writing and communication; prepared curricula and reports on best practices in leadership education and experiential education

Atlantic Coast Conference, Greensboro, North Carolina

Intern for Football Game Day Operations, Multimedia, and Legal Affairs, Fall 2013 and Fall 2014

- Drafted and reviewed contract provisions for corporate and media partnerships; assisted in enforcement of media and university contracts; assisted in football operations and game-day implementation of NCAA regulations and corporate partnerships

North Carolina Supreme Court, Raleigh, North Carolina

Judicial Extern for the Honorable Paul M. Newby, January 2014 to May 2014

- Researched and wrote legal memoranda on petitions for discretionary review before the North Carolina Supreme Court; assisted in briefing justice and other preparations for oral arguments before the court

North Carolina Administrative Office of the Courts, Raleigh, North Carolina

Extern for Legal and Legislative Services, Summer 2013

- Conducted extensive statutory research to create fiscal impact and court cost reference guides for use by judicial and legislative branch employees

Emily E. Seawell

810 W. Bessemer Ave. • Greensboro, N.C. 27408
eseawell@gmail.com • 336-740-4780

OTHER POSTGRADUATE WORK EXPERIENCE

AOL, Inc. / Patch, Tampa, Florida

Associate Regional Editor - Florida, May 2011 to June 2012

- Managed a network of community websites, employees, and contractors in the Tampa Bay area with a focus on editing, community relations, and user engagement; created and implemented regional strategies for improving readership rates, revenue, and efficiency; developed business and marketing partnerships with community leaders; worked collaboratively with sales and marketing managers to raise the company's local profile; wrote a regional business plan that won the national best in company award

Media General, Inc. (The Tampa Tribune, WFLA-TV, and TBO.com), Tampa, Florida

Multimedia Editor, November 2005 to May 2011

- Oversaw production of features and other advance content for newspapers in three metropolitan markets; led negotiations among senior managers in three states to create a universal code of professional standards; trained newsroom editors on online news production and print pagination systems; edited news, sports, and features articles for publication in print and online; planned, created, and edited multimedia projects for The Tampa Tribune and TBO.com, including designing web pages, editing HTML and CSS, and shooting and editing photos and videos; drafted multimedia and workflow strategies as a member of newsroom interactivity and social media strategy teams; was twice named employee of the month for collaboration

Lexington Herald-Leader, Lexington, Kentucky

Dow Jones National Honors Program Editing Intern, May 2005 to October 2005

- Edited news and features packages for factual and stylistic accuracy on daily deadline; wrote headlines, photo captions, and other display type aimed at concisely and effectively engaging and informing readers

EDUCATION

Elon University School of Law, Greensboro, North Carolina

Juris Doctor, May 2015

- Dean's Scholar; Leadership Fellow; ALI-CLE Award for Exemplary Scholarship and Leadership; NCBA Certificate for Commitment to Pro Bono Service; Editorial Board, *Elon Law Review*; Chair, Student Mentor Program; Chair, Elon Law Leadership Academy; Book Award, Legal Method & Communication; Book Award, Professional Responsibility; Presenter and Contributing Author, New York Law School *Symposium on Twenty Years of South African Constitutionalism*

University of Florida, Gainesville, Florida

Bachelor of Science in Journalism, April 2005

- Honors Program; National Merit Scholar; Managing Editor, *The Independent Florida Alligator* newspaper

SPEAKING ENGAGEMENTS

Appalachian State University, Boone, N.C., September 2016

- Spoke about the status of lawsuits challenging House Bill 589 and its implications for voters

Florida Public Relations Association, Tampa Bay chapter, July 2016

- Spoke on best practices in communication and community outreach on controversial legal issues

League of Women Voters of North Carolina, statewide conference, April 2016

- Spoke on best practices in legislative and local government advocacy and community engagement

Concerned Citizens of Northeast Greensboro, N.C., April 2016

- Spoke on legal and practical implications of House Bill 2 for communities of color

Citizens for Economic and Environmental Justice, Greensboro, N.C., August 2015

- Spoke on legal and practical implications of a redistricting plan for the Greensboro City Council

EXHIBIT F

Southern Coalition for Social Justice - *Wright/RWCA* - Attorneys' Fees Summary**Billable Time***Wright Case Only*

Timekeeper	Position	Hours	Hourly Rate	Total Amount Billed
Anita Earls	Executive Director	264.68	\$ 550.00	\$ 145,574.00
Allison Riggs	Senior Attorney	66.02	\$ 400.00	\$ 26,408.00
Christopher Ketchie	Policy Analyst	67.25	\$ 225.00	\$ 15,131.25
Emily Seawell	Legal Fellow (unlicensed)	11.4	\$ 200.00	\$ 2,280.00
Jeremy Collins	Legal Fellow (unlicensed)	21.75	\$ 200.00	\$ 4,350.00
Christopher Heaney	Legal Fellow (licensed)	5.36	\$ 250.00	\$ 1,340.00

TOTAL - Wright only 436.46 \$ 195,083.25

RWCA Case Only

Timekeeper	Position	Hours	Hourly Rate	Total Amount Billed
Anita Earls	Executive Director	47.85	\$ 550	\$ 26,317.50
Emily Seawell	Legal Fellow (unlicensed)	6.58	\$ 200	\$ 1,316.00
Joseph Crupi	Legal Intern (unlicensed)	8.25	\$ 150	\$ 1,237.50

TOTAL - RWCA only 62.68 \$ 28,871.00

RWCA/Wright - Consolidated

Timekeeper	Position	Hours	Hourly Rate	Total Amount Billed
Anita Earls	Executive Director	390.8	\$ 550.00	\$ 214,940.00
Allison Riggs	Senior Attorney	389.11	\$ 400.00	\$ 155,644.00
George Eppsteiner	Staff Attorney	110.3	\$ 300.00	\$ 33,090.00
Emily Seawell	Staff Attorney (post-licensure)	145.74	\$ 250.00	\$ 36,435.00
Emily Seawell	Legal Fellow (unlicensed)	175.89	\$ 200.00	\$ 35,178.00
Christopher Ketchie	Policy Analyst	23	\$ 225.00	\$ 5,175.00
Dr. Fred McBride	Senior Policy Analyst	108.2	\$ 225.00	\$ 24,345.00
Jaclyn Maffetore	Legal Extern (unlicensed)	44.3	\$ 150.00	\$ 6,645.00

TOTAL - Consolidated cases **1387.34** \$ **511,452.00**

Total Billable Amount \$ 735,406.25

Less 10% Reduction of Hours in RWCA for Unsuccessful Claim **(\$54,032.30)**

Total Amount Claimed \$ 681,373.95

Anita Earls - Time Records**Wright v. State of North Carolina ONLY**

Date	Timekeeper	Hours	Task	Description
3/20/2013	Earls, Anita Sue	0.3	Telephone Call - Clier Tf.	Yevonne Brannon
3/20/2013	Earls, Anita Sue	1	Review	district data, impact of S325, analyze plan comparisons
3/21/2013	Earls, Anita Sue	0.4	Telephone Call - Clier Tt.	Yevonne Brannon
3/21/2013	Earls, Anita Sue	0.5	Research	potential legal theories
3/21/2013	Earls, Anita Sue	0.25	Conf.	w/Allison re: potential claim
3/21/2013	Earls, Anita Sue	0.5	Review	precincts in proposed new districts
3/21/2013	Earls, Anita Sue	0.25	Conf.	w/Jeremy re: meeting with clients
3/21/2013	Earls, Anita Sue	0.25	email to	Client re: analysis of districts
3/25/2013	Earls, Anita Sue	0.4	Edit	Letter for public hearing
3/25/2013	Earls, Anita Sue	0.8	Edit	Public hearing letter
3/25/2013	Earls, Anita Sue	3.5	Appear at Hearing	Attend public hearing for Wake Delegation
3/25/2013	Earls, Anita Sue	0.3	Conf.	w/clients re: potential next steps
3/27/2013	Earls, Anita Sue	0.25	email to	clients re: potentially impacted areas
3/27/2013	Earls, Anita Sue	0.8	Research	media coverage of rationales for the plan
3/27/2013	Earls, Anita Sue	0.5	Review	existing research on disparities in Wake Co. pub. Schools
3/27/2013	Earls, Anita Sue	0.25	Research	impacted precincts compared to student attendance zones
3/27/2013	Earls, Anita Sue	0.3	Conf.	w/Jeremy re: legislative process & advocacy options
3/28/2013	Earls, Anita Sue	0.2	email to	clients re: legislative and litigation options
4/2/2013	Earls, Anita Sue	0.4	draft	retainer agreement
4/2/2013	Earls, Anita Sue	1.7	Mtg	in Raleigh with potential plaintiffs
4/4/2013	Earls, Anita Sue	2.5	draft	initial complaint
4/4/2013	Earls, Anita Sue	0.5	Telephone Call - Clier Tt.	Yevonne Brannon re plaintiffs and allegations for complaint
4/5/2013	Earls, Anita Sue	1.8	Edit	draft of complaint
4/11/2013	Earls, Anita Sue	0.25	email to	Yevonne Brannon re: status of bill
4/16/2013	Earls, Anita Sue	0.3	Telephone Call - Clier	Telephone call from Calla Wright
4/18/2013	Earls, Anita Sue	0.2	email to	Yevonne Brannon re: school board resolution
4/24/2013	Earls, Anita Sue	0.2	email from	clients re: school board resolution
4/25/2013	Earls, Anita Sue	0.25	Review	copy of school board resolution
5/3/2013	Earls, Anita Sue	0.5	Conf.	with Chris Ketchie re: possible analysis of districts
5/6/2013	Earls, Anita Sue	0.2	email	to client re: analysis of district plan alternatives
5/6/2013	Earls, Anita Sue	0.25	Conf.	with Allison re: legal claims
5/7/2013	Earls, Anita Sue	0.5	Conf.	with Chris Ketchie re: partisan evaluation of deviations
5/8/2013	Earls, Anita Sue	0.4	Conf.	w/Chris Ketchie re: results of data analysis

6/7/2013 Earls, Anita Sue	0.5 Conf.	w/Chris Ketchie re: impact of population changes; data from Dan Frey
6/8/2013 Earls, Anita Sue	0.7 review	Stam amendment changes
6/10/2013 Earls, Anita Sue	0.25 Conf.	w/Chris Ketchie re: analysis of partisan impact
6/12/2013 Earls, Anita Sue	0.5 Telephone Call - Clier	Telephone call with clients re: impact of stam amendments
6/13/2013 Earls, Anita Sue	0.8 Research	Potential claims
6/17/2013 Earls, Anita Sue	0.75 Conf.	w/Allison re: revising draft complaint
6/19/2013 Earls, Anita Sue	0.5 Conf.	w/Chris Ketchie re data required from General Assembly
6/20/2013 Earls, Anita Sue	0.8 Conf.	w/Allison & Chris re: impact of new districts
6/21/2013 Earls, Anita Sue	2 Mtg	w/Clients re: litigation requirements
6/27/2013 Earls, Anita Sue	0.5 Conf.	w/Chris Ketchie re: results of his analysis
7/9/2013 Earls, Anita Sue	0.2 Conf.	w/Allison re: data needed for complaint
7/23/2013 Earls, Anita Sue	0.3 Telephone Call - Clier Tf.	Yevonne Brannon re: preparing complaint
7/24/2013 Earls, Anita Sue	0.5 Telephone Call - Clier Tt.	Calla Wright, Earl Johnson
8/5/2013 Earls, Anita Sue	0.3 Conf.	w/Jeremy re: contacting clients
8/6/2013 Earls, Anita Sue	0.25 Conf.	w/Jeremy re: progress obtaining retainer agreements
8/12/2013 Earls, Anita Sue	1 Review	draft complaint
8/12/2013 Earls, Anita Sue	0.3 Conf.	w/Allison Riggs re: edits to complaint
8/13/2013 Earls, Anita Sue	0.35 Email	from Amy Womble re: residency issues, research and prepare response
8/14/2013 Earls, Anita Sue	0.8 Edit	complaint
8/20/2013 Earls, Anita Sue	1.2 Conf.	Conference call with plaintiffs re: filing complaint & litigation plan
8/20/2013 Earls, Anita Sue	0.5 Email	to clients with draft of complaint
8/21/2013 Earls, Anita Sue	0.8 Review	Client comments on draft complaint
8/21/2013 Earls, Anita Sue	0.75 draft	email outlining expected litigation budget
8/22/2013 Earls, Anita Sue	1 Review	final draft of complaint
8/26/2013 Earls, Anita Sue	0.5 Review	Summonses issued by court
8/29/2013 Earls, Anita Sue	1 Prepare	materials for service
9/4/2013 Earls, Anita Sue	0.5 Review	requirements for service
9/5/2013 Earls, Anita Sue	0.25 Email	to clients re: next steps
9/25/2013 Earls, Anita Sue	1 Review	recent court filings & order assigning magistrate
10/23/2013 Earls, Anita Sue	0.5 Review	and respond to Email from Allison re: update on Status of case
11/1/2013 Earls, Anita Sue	0.5 File	Waiver of service documents
11/4/2013 Earls, Anita Sue	1 Review	Motion to Dismiss and Answer
11/5/2013 Earls, Anita Sue	0.25 Review	Order for Discovery Plan
11/13/2013 Earls, Anita Sue	4.6 Research	Grounds for motion to dismiss, sovereign immunity issues
11/13/2013 Earls, Anita Sue	2 Draft	Amended Complaint
11/15/2013 Earls, Anita Sue	3.2 Research	motion to amend

11/15/2013 Earls, Anita Sue	1.5 draft	Motion to amend complaint & draft Order
11/15/2013 Earls, Anita Sue	0.3 Email	to clients re: motion to dismiss and response
11/19/2013 Earls, Anita Sue	7.5 draft	Memorandum in support of mot to amend
11/19/2013 Earls, Anita Sue	0.5 File	Motion for leave to file amended complaint and amended complt
11/22/2013 Earls, Anita Sue	11.5 Research	and draft memorandum opposing motion to dismiss
11/23/2013 Earls, Anita Sue	2.5 Edit	and file memorandum opposing motion to dismiss
12/4/2013 Earls, Anita Sue	0.2 email	to clients update on status of case
2/21/2014 Earls, Anita Sue	0.25 review	notice of hearing
2/23/2014 Earls, Anita Sue	0.2 email	to Allison re: covering hearing
2/23/2014 Earls, Anita Sue	0.25 email	to law school cancelling panel presentation because of Wright hearing
2/23/2014 Earls, Anita Sue	0.2 email	to clients re: hearing on motion to amend
2/24/2016 Earls, Anita Sue	0.3 email	to clients explaining purpose of hearing & responding to questions
2/24/2014 Earls, Anita Sue	1.75 Prepare	for argument on motion
2/25/2014 Earls, Anita Sue	0.3 email	to clients re: hearing in Elizabeth City
2/26/2014 Earls, Anita Sue	2.5 Prepare	for hearing
2/27/2014 Earls, Anita Sue	6.5 Travel	to and from Elizabeth City for Hearing on Motion to Dismiss
2/27/2014 Earls, Anita Sue	1.5 Appear at Hearing	Hearing on Motion for leave to file amended complaint
2/27/2014 Earls, Anita Sue	0.35 Telephone Call - Clier tt.	Yevonne Brannon and Calla Wright re: hearing on motions
2/27/2014 Earls, Anita Sue	0.25 Conf.	w/opposing counsel re: possible discovery schedule
3/17/2014 Earls, Anita Sue	1.5 Review	Order granting motion to dismiss
3/17/2014 Earls, Anita Sue	0.5 Telephone Call - Clier	telephone calls to clients re: dismissal of case
3/17/2014 Earls, Anita Sue	0.3 Emails	responding to inquiries regarding dismissal of claims
3/17/2014 Earls, Anita Sue	0.5 Conf.	with Allison re: appeal
3/18/2014 Earls, Anita Sue	0.3 email	to clients re: dismissal of case, next steps
3/19/2014 Earls, Anita Sue	0.4 Telephone Call - Clier Tf.	Clients re possible appeal
3/27/2014 Earls, Anita Sue	0.5 Email	to clients with doodle poll to set up meeting re: appeal
3/28/2014 Earls, Anita Sue	3.5 Research	re: grounds for appeal
3/28/2014 Earls, Anita Sue	0.2 Email	to clients with details of meeting
3/29/2014 Earls, Anita Sue	0.1 Email	to Allison re: appeal
3/31/2014 Earls, Anita Sue	0.1 Email	reminder to clients re: meeting
4/1/2014 Earls, Anita Sue	0.5 Email	mutiple emails to clients to set up meeting on appeal
4/2/2014 Earls, Anita Sue	1.5 Meeting	with clients to discuss appeal
4/7/2014 Earls, Anita Sue	0.65 draft	and file notice of appeal
4/7/2014 Earls, Anita Sue	0.2 email	to Shannah re: posing notice of appeal
4/7/2014 Earls, Anita Sue	0.2 email	to Allison re: assistance with appeal
4/8/2014 Earls, Anita Sue	0.25 Email	to client explaining rationale for appeal

4/9/2014 Earls, Anita Sue	0.3 Review	docketing notice
4/9/2014 Earls, Anita Sue	0.45 draft	and file notice of appearance
4/10/2014 Earls, Anita Sue	0.25 Review	appeal deadlines
4/15/2014 Earls, Anita Sue	0.2 Email	to Chris Heaney re: docs needed for appeal
4/15/2014 Earls, Anita Sue	4.5 Research	legal grounds for appeal on merits of claim
4/16/2014 Earls, Anita Sue	2.75 draft	and file corporate disclosure statements and docketing statement
4/16/2014 Earls, Anita Sue	1.25 Research	qualified immunity issues for appeal
4/16/2014 Earls, Anita Sue	1.6 Draft	proposed joint appendix
4/16/2014 Earls, Anita Sue	0.5 Email	with letter to opposing counsel re: joint appendix
4/16/2014 Earls, Anita Sue	0.3 Draft	letter to opposing counsel serving filed documents
4/30/2014 Earls, Anita Sue	0.3 Review	emails from opposing counsel re: joint appendix and respond
4/30/2014 Earls, Anita Sue	0.8 draft	correction to docketing statement and file
5/12/2014 Earls, Anita Sue	1.25 Research	partisan gerrymander cases
5/13/2014 Earls, Anita Sue	2.5 Research	one-person, one-vote claims, basis for expansion of law
5/13/2014 Earls, Anita Sue	0.75 Emails	from printer re: joint appendix, compile joint appendix
5/14/2014 Earls, Anita Sue	2.5 Research	significance of summary affirmance, legal issues for appeal
5/18/2014 Earls, Anita Sue	4.3 draft	4th circuit brief statement of facts
5/19/2014 Earls, Anita Sue	12.5 draft	brief and legal research for brief
5/19/2014 Earls, Anita Sue	0.25 email	to Chris Heaney with copy of joint appendix
5/20/2014 Earls, Anita Sue	7.4 draft	brief and email to printer
5/20/2014 Earls, Anita Sue	0.35 Conf.	with Allison re: brief
5/20/2014 Earls, Anita Sue	0.3 Email	to law professor with draft of brief seeking input
5/20/2014 Earls, Anita Sue	0.2 Email	to client re:draft of brief
5/20/2014 Earls, Anita Sue	3.25 Edit	draft brief & incorporate changes
5/20/2014 Earls, Anita Sue	0.5 Emails	to printer with revisions to brief
5/21/2014 Earls, Anita Sue	2.5 Review	printer's draft of brief
5/21/2014 Earls, Anita Sue	0.2 Email	to Chris Heaney re: draft of brief
5/21/2014 Earls, Anita Sue	0.2 Email	to clients with final brief
7/2/2014 Earls, Anita Sue	0.5 Review	Appellees brief
7/2/2014 Earls, Anita Sue	0.2 email	to clients with copy of appellees brief
7/8/2014 Earls, Anita Sue	0.25 email	to printer to establish deadlines for reply brief
7/11/2014 Earls, Anita Sue	5.2 Research	cases cited by Appellees
7/11/2014 Earls, Anita Sue	0.5 Conf.	with Allison re: strategy for reply brief
7/12/2014 Earls, Anita Sue	7.25 Research	and draft reply brief
7/14/2014 Earls, Anita Sue	0.1 Email	responding to question regarding status of case
7/14/2014 Earls, Anita Sue	0.25 Email	to Shelvia and Jeremy re: assistance needed

7/14/2014 Earls, Anita Sue	5.5 draft	reply brief
7/15/2014 Earls, Anita Sue	4.75 draft	reply brief
7/15/2014 Earls, Anita Sue	0.25 Review	cases from Chris Heaney & Email from Jeremy Collins
7/16/2014 Earls, Anita Sue	8.5 draft	& edit reply brief, review printers' proofs, emails to printer
9/5/2014 Earls, Anita Sue	1.33 Review	court calendar and email to clients with briefs
9/15/2014 Earls, Anita Sue	0.4 Review	emails from Alec Peters re: counsel's availability
10/2/2014 Earls, Anita Sue	0.25 draft	and file oral argument acknowledgement form
10/14/2014 Earls, Anita Sue	0.5 Emails	to and from clients re: significance of oral argument
10/16/2014 Earls, Anita Sue	1 Meeting	with clients re: potential remedial issues
10/27/2014 Earls, Anita Sue	1 Telephone Call - Clier	telephone from Calla Wright & emails to Yevonne Brannon
11/19/2014 Earls, Anita Sue	0.5 Conf.	with Allison re: preparing for oral argument
11/25/2014 Earls, Anita Sue	0.25 Conf.	with Allison regarding case notebooks and oral arg. prep
11/25/2014 Earls, Anita Sue	0.2 Email	to clients re: plans for oral argument prep.
12/1/2014 Earls, Anita Sue	0.2 email to	Allison re: possible judges for practice argument
12/2/2014 Earls, Anita Sue	1 Prepare	for oral argument
12/3/2014 Earls, Anita Sue	0.75 Conf Call	w/Kareem re: prep. for oral argument
12/3/2014 Earls, Anita Sue	0.1 Email	to Allison re: oral argument prep.
12/4/2014 Earls, Anita Sue	0.5 email to	clients re: facts relating to oral argument
12/4/2014 Earls, Anita Sue	2 Prepare	for oral argument including practice argument
12/5/2014 Earls, Anita Sue	4.25 Prepare	for 4th Cir. oral argument including practice argument
12/6/2014 Earls, Anita Sue	1 Prepare	for oral argument
12/8/2014 Earls, Anita Sue	2.25 Prepare	for oral argument
12/9/2014 Earls, Anita Sue	3.2 Travel	to Richmond
12/9/2014 Earls, Anita Sue	2 Attend	oral arguments in 4th circuit to observe
12/9/2014 Earls, Anita Sue	11 Prepare	for oral argument
12/10/2014 Earls, Anita Sue	3 Appear at Hearing	to argue appeal in 4th circuit
12/10/2014 Earls, Anita Sue	2 Travel	to Washington, DC for presentation on case theory
12/15/2014 Earls, Anita Sue	0.5 Conf.	with Allison to review oral argument
5/27/2015 Earls, Anita Sue	1 Review	4th Circuit opinion
5/27/2015 Earls, Anita Sue	0.5 Review	emails re: 4th circuit decision
6/1/2015 Earls, Anita Sue	1.5 draft	email to clients explaining opinion and next steps
6/2/2015 Earls, Anita Sue	1 Email	from clients and responding to clients' questions about ruling
6/8/2015 Earls, Anita Sue	0.25 Email	correspondance with opposing counsel re: withdrawal
6/10/2015 Earls, Anita Sue	0.5 Review	court filings re: defendants' representation
6/10/2015 Earls, Anita Sue	1.5 Review	Defendants' petition for rehearing and emails to co-counsel and clients re: same
6/17/2015 Earls, Anita Sue	0.75 Review	court order requiring response to petition for rehearing

6/17/2015 Earls, Anita Sue	0.25 email	to Allison and George re: response required
6/17/2015 Earls, Anita Sue	0.2 email	to clients with update on case status
6/25/2015 Earls, Anita Sue	1.5 Meeting	with clients to answer questions re: status of case
6/26/2015 Earls, Anita Sue	10.75 Research	re: grounds for rehearing & draft response
6/27/2015 Earls, Anita Sue	12.2 Draft	Response to Petition for Rehearing
6/29/2015 Earls, Anita Sue	5.5 Edit	Response to Petition for Rehearing, incorporate comments & file
6/29/2015 Earls, Anita Sue	0.25 Review	Response to Petition for rehearing filed by AG's office and email to Allison and George
7/15/2015 Earls, Anita Sue	0.5 Review	Order denying petition for rehearing, email to clients, Allison & Emily
7/16/2015 Earls, Anita Sue	0.3 Email	denial of rehearing to co-counsel, research rules re: mandate
7/24/2015 Earls, Anita Sue	0.35 Review	Order reassinging case and email to clients
8/19/2015 Earls, Anita Sue	0.2 Review	filings re: Defendants' counsel in Wright v. NC
TOTAL	264.68	

Anita Earls - Time Records**RWCA v. Wake Co. Bd. of Elections ONLY**

Date	Timekeeper	Hours	Task	Description
3/6/2015	Earls, Anita Sue	0.5	Telephone ca	From client re: proposal to change Wake Co. Commission Districts
3/6/2015	Earls, Anita Sue	0.3	Email	to CK re: analysis needed of proposed Wake Co. Districts
3/6/2015	Earls, Anita Sue	1.5	Review	data regarding proposed district plan and email to clients
3/6/2015	Earls, Anita Sue	0.4	Review	draft legislation S181
3/6/2015	Earls, Anita Sue	0.5	Review	notes of Senate Redistricting Committee mtg. 3/5
3/6/2015	Earls, Anita Sue	0.75	Telephone ca	to client re: proposed legislation
3/16/2015	Earls, Anita Sue	1.5	Review	analysis of districts, telephone call to client
3/16/2015	Earls, Anita Sue	0.5	Conf.	with Chris Ketchie re: district maps
3/16/2015	Earls, Anita Sue	0.3	Email	to client explaining analysis of maps
3/17/2015	Earls, Anita Sue	0.2	Email	to CK re: block assignment files
3/21/2015	Earls, Anita Sue	0.5	Draft	individual and organization retainer agreements
3/21/2015	Earls, Anita Sue	0.3	Email	to client with draft retainer agreement
3/23/2015	Earls, Anita Sue	0.75	Review	draft taking points re: potential legislation
3/24/2015	Earls, Anita Sue	0.5	Email	to clients re: impact of existing litigation on legislative proposal
3/24/2015	Earls, Anita Sue	0.2	Review	emails from clients
3/25/2015	Earls, Anita Sue	2.5	Meeting	with potential clients in Raleigh
4/2/2015	Earls, Anita Sue	0.5	Emails	re: setting up meeting with clients
4/6/2015	Earls, Anita Sue	1.5	Review	initial draft complaint
4/7/2015	Earls, Anita Sue	1.3	Meeting	with potential clients in Raleigh
4/7/2015	Earls, Anita Sue	2.4	Research	grounds for racial gerrymander claim
4/8/2015	Earls, Anita Sue	0.2	Email	to follow up with clients
4/8/2015	Earls, Anita Sue	0.5	Email	and conf. w/CK re: analysis needed for one-person, one vote claim
4/8/2015	Earls, Anita Sue	0.5	Review	CK analysis of split precincts for gerrymander claim
4/8/2015	Earls, Anita Sue	1.5	Emails	back and forth with clients re: allegations of complaint
4/8/2015	Earls, Anita Sue	5.75	Draft	complaint
4/9/2015	Earls, Anita Sue	6.8	Revise	draft complaint, draft pleadings, file complaint
4/10/2015	Earls, Anita Sue	2.5	Review	and file financial disclosure statements
4/13/2015	Earls, Anita Sue	0.5	Review	filings and forward to J. Crupi for pleadings file
4/14/2015	Earls, Anita Sue	0.3	email	to clients re: filing
5/5/2015	Earls, Anita Sue	0.5	email	to Alec Peters with complaint & pleadings
5/5/2015	Earls, Anita Sue	0.6	Review	and respond to email from Charles Marshall
5/28/2015	Earls, Anita Sue	0.5	email	to Alec Peters re: dismissal in light of Wright ruling

5/28/2015	Earls, Anita Sue	0.3	email	to clients re: impact of Wright decision
6/1/2015	Earls, Anita Sue	0.5	Email	and telephone call from Charles Marshall re: extension of time to file answer
6/1/2015	Earls, Anita Sue	0.4	Email	to clients explaining impact of Wright decision
6/2/2015	Earls, Anita Sue	0.2	Email	responding to client question
6/4/2015	Earls, Anita Sue	0.5	Email	to clients regarding next steps
6/4/2015	Earls, Anita Sue	0.2	Email	to Charles Marshall confirming telephone conversation
6/5/2015	Earls, Anita Sue	0.35	Email	to clients with copy of Amended Complaint
6/5/2015	Earls, Anita Sue	0.5	Review	filing of waiver of service
6/5/2015	Earls, Anita Sue	0.5	Draft	notice of voluntary dismissal
6/5/2015	Earls, Anita Sue	1.5	Draft	Amended Complaint
6/5/2015	Earls, Anita Sue	0.2	Review	and file Amended Complaint
6/5/2015	Earls, Anita Sue	0.2	Email	to opposing counsel with copies of filings
6/8/2015	Earls, Anita Sue	0.2	Email	to Emily and Allison re: filings
6/17/2015	Earls, Anita Sue	0.5	Review	filings by opposing counsel
6/18/2015	Earls, Anita Sue	0.3	Review	Court order extending time to answer
7/17/2015	Earls, Anita Sue	0.5	Review	Order reassigning case and email to clients
8/3/2015	Earls, Anita Sue	1	Review	Answer filed by Wake Co. Bd. of Elections
8/18/2015	Earls, Anita Sue	0.3	Review	Order for Discovery Plan
8/24/2015	Earls, Anita Sue	1.5	Review	Amended Answer and email to clients
9/8/2015	Earls, Anita Sue	0.3	Email	to opposing counsel to set up 26(f) meeting
9/9/2015	Earls, Anita Sue	0.1	Email	to opposing counsel confirming call
9/9/2015	Earls, Anita Sue	0.75	Conf.	with Allison & Emily re: litigation schedule
Total		47.85		

Anita Earls - Time Records
RWCA v. Wake Co. Bd. of Elections & Wright v. NC CONSOLIDATED

Date	Timekeeper	Hours	Task	Description
9/11/2015	Earls, Anita Sue	0.75	Conf.	with Charles Marshall re: 26(f) report
9/11/2015	Earls, Anita Sue	0.5	Conf.	with Allison & Emily re: preparing initial disclosures
9/14/2015	Earls, Anita Sue	1.5	Draft	Discovery plan
9/14/2015	Earls, Anita Sue	0.3	Email	to Charles Marshall with proposed discovery plan in both cases
9/16/2015	Earls, Anita Sue	0.5	Email	and telephone conversation about scheduling
9/17/2015	Earls, Anita Sue	0.3	Email	from Charles Marshall re: changes to proposed scheduling plan
9/18/2015	Earls, Anita Sue	0.5	Conf.	and email with Emily re: defendants proposed schedule
9/23/2015	Earls, Anita Sue	0.5	Conf.	with Charles Marshall re: discovery plan
9/23/2015	Earls, Anita Sue	0.75	Edit	file and serve joint discovery report
9/23/2015	Earls, Anita Sue	0.2	Telephone	Call to Clerk's office re: conference with Judge
9/24/2015	Earls, Anita Sue	0.2	Email	with Charles Marshall re: conference with Judge on discovery deadlines
9/24/2015	Earls, Anita Sue	0.3	Email	to clients to set up conference call
9/24/2015	Earls, Anita Sue	0.2	Review	notice from court re: scheduling hearing
9/24/2015	Earls, Anita Sue	0.5	Review	and edit draft initial disclosures
9/25/2015	Earls, Anita Sue	0.5	Review	Draft initial disclosures
9/28/2015	Earls, Anita Sue	0.2	Email	to clients confirming conference call meeting
9/28/2015	Earls, Anita Sue	0.3	Emails	back and forth with clients re: case update and conference call
9/30/2015	Earls, Anita Sue	1	Conf.	with clients re: status of case and next steps
9/30/2015	Earls, Anita Sue	0.5	Conf.	with Emily and Allison re: preparing for scheduling hearing
10/1/2015	Earls, Anita Sue	0.75	Conf.	with Allison re: issues for scheduling conference
10/1/2015	Earls, Anita Sue	1.2	Prepare	for scheduling conference
10/1/2015	Earls, Anita Sue	1.8	Appear	at scheduling confence with Court in Raleigh
10/1/2015	Earls, Anita Sue	0.5	Email	to clients with update on case schedule
10/1/2015	Earls, Anita Sue	0.3	Email	responding to client questions regarding next steps
10/1/2015	Earls, Anita Sue	0.1	Review	court's consolidation and scheduling order
10/1/2015	Earls, Anita Sue	0.2	Email	to Emily attaching pleadings for pleadings file
10/2/2015	Earls, Anita Sue	1.5	Review	& edit draft discovery and trial plan
10/5/2015	Earls, Anita Sue	0.2	Email	to client re: preparing for trial
10/7/2015	Earls, Anita Sue	1	Telephone	to Jowei Chen re: Wake County analysis
10/8/2015	Earls, Anita Sue	0.5	Email	to Dr. Chen with pleadings, to set up conference call
10/8/2015	Earls, Anita Sue	0.5	Review	materials for Dr. Chen
10/8/2015	Earls, Anita Sue	0.5	Conf.	with Allison re: Chen testimony
10/8/2015	Earls, Anita Sue	1	Conf.	with Allison & Emily re: discovery and trial plan

10/12/2015 Earls, Anita Sue	1 Conf.	with Dr. Chen re: analysis needed in case
10/20/2015 Earls, Anita Sue	1.5 Email	and telephone conversation with Tony Fairfax re: demographic analysis
10/20/2015 Earls, Anita Sue	0.5 Email	retainer letter to Tony Fairfax
10/20/2015 Earls, Anita Sue	0.4 Conf.	with Fred McBride re: data Fairfax needs
10/20/2015 Earls, Anita Sue	0.5 Email	to Fairfax with complaint and other materials
10/21/2015 Earls, Anita Sue	0.6 Emails	to Emily and to Tony Fairfax re: legislative timeline
10/29/2015 Earls, Anita Sue	1 Conf.	With Allison & Emily re: legislative history transcripts
10/29/2015 Earls, Anita Sue	0.5 Review	Fairfax draft report
10/29/2015 Earls, Anita Sue	0.5 Telephone	call with Tony Fairfax re: additional materials needed for analysis
10/30/2015 Earls, Anita Sue	0.6 Email	to Tony Fairfax re: draft report
10/30/2015 Earls, Anita Sue	0.4 Review	and respond to email from Allison re: Fairfax report and additional analysis needed
11/2/2015 Earls, Anita Sue	2.5 Review	Draft expert reports, conf. & emails with Fairfax and Chen, conf. w/Allison, email to opposing counsel se
11/3/2015 Earls, Anita Sue	0.2 Review	Court filings
11/4/2015 Earls, Anita Sue	0.75 Review	motion to quash and supporting memorandum
11/9/2015 Earls, Anita Sue	0.2 Review	email from opposing counsel
11/10/2015 Earls, Anita Sue	1 Review	draft response opposing motion to quash
11/10/2015 Earls, Anita Sue	0.2 Telephone	Call from client re: case update
11/13/2015 Earls, Anita Sue	0.5 Emails	and telephone call from Charles Marshall
11/13/2015 Earls, Anita Sue	0.75 Review	draft amended disclosures
11/13/2015 Earls, Anita Sue	0.5 Email	to Charles Marshall re: document requests
11/13/2015 Earls, Anita Sue	0.2 Review	Supplemental disclosures of legislative materials
11/13/2015 Earls, Anita Sue	0.4 Email	to Charles Marshall attaching supplemental disclosures
11/16/2015 Earls, Anita Sue	0.75 Review	documents served by Defendants
11/16/2015 Earls, Anita Sue	0.5 Email	to Charles Marshall with revisions to email search terms
11/16/2015 Earls, Anita Sue	0.3 Email	to Dr. Chen re: Defendants' document requests
11/17/2015 Earls, Anita Sue	0.35 Email	to Fred McBride re: defendants' document request
11/28/2015 Earls, Anita Sue	0.85 Email	from Jowei Chen with documents requested by Defendants
11/30/2015 Earls, Anita Sue	2.8 Review	and edit plaintiffs' responses to doc. Requests, email to opposing counsel
11/30/2015 Earls, Anita Sue	0.5 Review	Case management order and pretrial conference requirements
12/1/2015 Earls, Anita Sue	0.2 Review	email re: legislative record and conf. w/Emily
12/1/2015 Earls, Anita Sue	0.3 Email	to Tony Fairfax providing legislative record information
12/1/2015 Earls, Anita Sue	0.5 Review	documents and email to Emily & Allison re: legislator statements
12/2/2015 Earls, Anita Sue	0.2 Email	to Fred McBride re: backup for expert witness docs
12/3/2015 Earls, Anita Sue	0.5 Review	Court order on Motion to Quash
12/3/2015 Earls, Anita Sue	0.4 Conf.	with George and Allison re: obtaining & reviewing docs.
12/6/2015 Earls, Anita Sue	1.8 Review	Plaintiffs proposed findings of fact

12/6/2015 Earls, Anita Sue	1.5 Review	Draft trial brief
12/7/2015 Earls, Anita Sue	3.25 Review	Trial plan, mtg. With trial team, prepare outlines
12/8/2015 Earls, Anita Sue	0.3 Email	to Jowei Chen re: Defendants' Proposed Findings of Fact
12/8/2015 Earls, Anita Sue	0.5 Review	trial subpoenas
12/8/2015 Earls, Anita Sue	1.2 Review	draft response to trial beirf
12/8/2015 Earls, Anita Sue	0.3 Emails	to Dr. Chen re: trial testimony prep
12/9/2015 Earls, Anita Sue	0.5 Telephone	call with Alec Peters re: compliance with subpoenas
12/9/2015 Earls, Anita Sue	0.2 Email	to Peters and AG's office re: RWCA pretrial order and exhibit list
12/9/2015 Earls, Anita Sue	1.4 Review	Defendants' pretrial filings
12/9/2015 Earls, Anita Sue	1 Conf.	with trial team re: pretrial preparations
12/9/2015 Earls, Anita Sue	2.2 Review	trial briefs and prepare for trial
12/9/2015 Earls, Anita Sue	1.5 Review	Trial strategy outline, prepare for trial
12/10/2015 Earls, Anita Sue	2.5 Appear	at Pre-trial conference;
12/10/2015 Earls, Anita Sue	1.25 Conf.	with trial team re: prep for trial
12/10/2015 Earls, Anita Sue	1.5 Prepare	trial witness planner
12/10/2015 Earls, Anita Sue	2.5 Review	draft proposed stipulations
12/11/2015 Earls, Anita Sue	1.3 Edit	trial witness planner
12/11/2015 Earls, Anita Sue	0.35 Email	to Dr. Chen re: trial exhibits
12/11/2015 Earls, Anita Sue	1.75 Meeting	with Dan Blue to prepare trial testimony
12/12/2015 Earls, Anita Sue	2.6 Prepare	trial testimony outlines
12/12/2015 Earls, Anita Sue	0.5 Email	back and forth with Jowei Chen re: trial exhibits
12/12/2015 Earls, Anita Sue	1.5 Meeting	with trial team to divide tasks and review strategy
12/12/2015 Earls, Anita Sue	3.5 Prepare	witness testimony outlines
12/12/2015 Earls, Anita Sue	2.75 Review	Wake Co. School Board emails and docs.
12/12/2015 Earls, Anita Sue	0.75 Conf.	with trial team re: demonstrative exhibits
12/13/2015 Earls, Anita Sue	3.5 Prepare	witness outlines and conf. with experts
12/13/2015 Earls, Anita Sue	1.5 Review	Trial briefs and elements of proof
12/13/2015 Earls, Anita Sue	2.5 Prepare	witness notebooks
12/13/2015 Earls, Anita Sue	0.75 Emails	with Dr. Chen re: trial exhibits and testimony outline
12/13/2015 Earls, Anita Sue	1.5 Review	exhibit list
12/14/2015 Earls, Anita Sue	1.2 Prepare	Earl Johnson testimony
12/14/2015 Earls, Anita Sue	2.5 Review	witness testimony of James West & Bill Fletcher
12/14/2015 Earls, Anita Sue	0.5 Email	to clients with trial info
12/14/2015 Earls, Anita Sue	1.5 Review	witness testimony outlines - school board witnesses
12/14/2015 Earls, Anita Sue	1.4 Edit	trial witness planner
12/14/2015 Earls, Anita Sue	2.3 Review	witness testmony outlines - legislators

12/15/2015	Earls, Anita Sue	3.5	Prepare	Jowei Chen testimony
12/15/2015	Earls, Anita Sue	2.5	Prepare	witness exhibits
12/15/2015	Earls, Anita Sue	3.75	Prepare	Tony Fairfax witness testimony
12/15/2015	Earls, Anita Sue	1.5	Edit	trial witness planner
12/15/2015	Earls, Anita Sue	1.5	Prepare	opening statement
12/15/2015	Earls, Anita Sue	0.5	Email	to Charles Marshall with updated exhibits
12/15/2015	Earls, Anita Sue	2.75	Prepare	trial notebook and exhibit notebooks
12/16/2015	Earls, Anita Sue	9	Appear	First day of trial
12/16/2015	Earls, Anita Sue	3.5	Prepare	testimony for second day of trial
12/16/2015	Earls, Anita Sue	1	Travel	to and from Raleigh for trial
12/17/2015	Earls, Anita Sue	8	Appear	Second day of trial
12/17/2015	Earls, Anita Sue	0.3	Email	responding to questions regarding legislative privilege
12/17/2015	Earls, Anita Sue	3.75	Prepare	closing argument
12/17/2015	Earls, Anita Sue	1	Travel	to and from Raleigh for trial
12/18/2015	Earls, Anita Sue	4.5	Appear	Third day of trial
12/18/2015	Earls, Anita Sue	2.3	Telephone	calls and emails to clients with trial update
12/18/2015	Earls, Anita Sue	1	Travel	to and from Raleigh for trial
12/21/2015	Earls, Anita Sue	0.5	Email	to clients summarizing trial and next steps
12/21/2015	Earls, Anita Sue	1.5	Review	organize and store trial materials
12/30/2015	Earls, Anita Sue	0.5	Email	re: status of litigation
1/5/2016	Earls, Anita Sue	0.2	Email	responding to request for information on status of case
1/14/2016	Earls, Anita Sue	0.2	Email	re: transcript of trial proceedings
1/26/2016	Earls, Anita Sue	0.1	Email	concerning delay in obtaining trial transcript
1/29/2016	Earls, Anita Sue	0.5	Conf.	with Allison regarding legislators post-trial disclosures
2/4/2016	Earls, Anita Sue	0.2	email	to client regarding status of case
2/26/2016	Earls, Anita Sue	1.5	Review	Email with decision from District Court & emails to Allison
2/29/2016	Earls, Anita Sue	2.5	Review	District court opinion and grounds for appeal
3/1/2016	Earls, Anita Sue	0.5	Email	to clients re: impact of decision
3/2/2016	Earls, Anita Sue	1	Conf Call	Talk with all clients about decision
3/2/2016	Earls, Anita Sue	1.2	Meet	with trial team to discuss next steps
3/3/2016	Earls, Anita Sue	0.6	Draft	email and send to clients update on appeal
3/10/2016	Earls, Anita Sue	0.5	Review	draft notices of appeal, emails to Emily & Allison re: timing of filing
3/15/2016	Earls, Anita Sue	0.3	Conf.	with Allison & Emily re: filing appeal, docketing statement, deadlines
3/16/2016	Earls, Anita Sue	0.5	Review	court notice requesting response to inquiry
3/28/2016	Earls, Anita Sue	1.5	Review	Appellees' filings and response to court inquiry
3/28/2016	Earls, Anita Sue	1.25	Review	Draft notice re: constitutional challenge and Response to inquiry

3/28/2016 Earls, Anita Sue	0.5 Edit	Appellants' motion to expedite appeal
3/30/2016 Earls, Anita Sue	0.3 Review	court order re: record in connection with motion to expedite
4/5/2016 Earls, Anita Sue	0.25 Review	court order expediting appeal
4/6/2016 Earls, Anita Sue	0.45 Email	to clients updating status of case
4/6/2016 Earls, Anita Sue	0.8 Emails	to numerous individual clients responding to questions about appeal
4/7/2016 Earls, Anita Sue	0.2 Review	Oral argument acknowledgment form
4/8/2016 Earls, Anita Sue	0.5 Conf.	with Allison & Emily re: oral argument strategy
4/9/2016 Earls, Anita Sue	1.5 Conf.	with Allison re: Appellants' brief
4/12/2016 Earls, Anita Sue	1.5 Edit	Draft brief
4/13/2014 Earls, Anita Sue	0.5 Conf.	With Allison re: joint appendix contents
4/25/2016 Earls, Anita Sue	1.5 Review	Appellees' brief
4/26/2016 Earls, Anita Sue	0.5 Conf.	with Allison re: contents of reply brief and divide up drafting
4/27/2016 Earls, Anita Sue	2.75 Review	legal research and George and Emily's outlines for reply brief
4/28/2016 Earls, Anita Sue	8.75 Draft	reply brief section on OPOV claims
4/29/2016 Earls, Anita Sue	3.8 Edit	and proof reply brief
4/29/2016 Earls, Anita Sue	1.2 Emails	Requesting assistance with oral argument prep to multiple attorneys
5/2/2016 Earls, Anita Sue	0.4 Emails	and telephone calls re: details of oral argument prep
5/3/2016 Earls, Anita Sue	0.1 Email	from client re: oral argument & response
5/3/2016 Earls, Anita Sue	2.5 Review	cases to prepare for oral argument
5/4/2016 Earls, Anita Sue	4.5 Review	briefs and cases, outline oral argument
5/5/2016 Earls, Anita Sue	2.25 Draft	outline for oral argument, research cases
5/5/2016 Earls, Anita Sue	1.5 Conf.	Practice for oral argument
5/6/2016 Earls, Anita Sue	7.5 Prepare	for oral argument - review expert reports, trial testimony
5/7/2016 Earls, Anita Sue	6.25 Prepare	outlines of key cases and review briefs
5/7/2016 Earls, Anita Sue	0.5 Telephone	with clients re: remedy questions
5/8/2016 Earls, Anita Sue	2.75 Travel	Travel to Richmond
5/8/2016 Earls, Anita Sue	7.5 Prepare	Review briefs and cases to prepare for argument, assemble notebook
5/9/2016 Earls, Anita Sue	4.25 Prepare	Practice oral argument & edit outline
5/9/2016 Earls, Anita Sue	2 Argument	Appear at 4th Circuit Oral argument
5/9/2016 Earls, Anita Sue	0.75 Meet	with clients to discuss oral argument & next steps
5/9/2016 Earls, Anita Sue	2.75 Travel	Travel back from Richmond
5/10/2016 Earls, Anita Sue	0.75 Email	to clients summarizing oral argument
5/31/2016 Earls, Anita Sue	0.25 Review	Notice from Court re: trial exhibit
5/31/2016 Earls, Anita Sue	1.25 Draft	Response to court request for exhibit
6/2/2016 Earls, Anita Sue	0.4 Edit	Edit Response to Court notice and file response
6/23/2016 Earls, Anita Sue	0.25 Research	factual question from client re: S325

6/29/2016 Earls, Anita Sue	0.6 Email	re: Dr. Chen's report and testimony - request for info
7/1/2016 Earls, Anita Sue	0.5 Email	to clients re: 4th Circuit opinion
7/1/2016 Earls, Anita Sue	0.3 Email	to expert witnesses re: outcome of appeal
7/1/2016 Earls, Anita Sue	1.25 Review	Read Fourth Circuit opinion
7/1/2016 Earls, Anita Sue	1.5 Conf.	Discuss Fourth Circuit opinion w/ clients
7/2/2016 Earls, Anita Sue	0.5 Email	and telephone call re: impact of decision
7/5/2016 Earls, Anita Sue	0.75 Email	to clients re: next steps and setting up conference call
7/6/2016 Earls, Anita Sue	1.25 Conf.	call with clients re: remedial stage options
7/6/2016 Earls, Anita Sue	2.8 Draft	letter to opposing counsel re: implementation of remedy
7/6/2016 Earls, Anita Sue	0.5 Conf.	with Allison & Emily re: remedial steps
7/11/2016 Earls, Anita Sue	0.5 Review	Court order re: views on court-ordered remedial plan
7/11/2016 Earls, Anita Sue	0.8 Review	Progress on determining plaintiffs' proposed remedy
7/11/2016 Earls, Anita Sue	0.5 Telephone	From clients re: Wake Co. Board of Elections meeting
7/12/2016 Earls, Anita Sue	1.8 Email	and telephone calls re: potential remedial proceedings & timing
7/12/2016 Earls, Anita Sue	0.5 Legal Rese	re: right to intervene by legislators
7/12/2016 Earls, Anita Sue	1.5 Telephone	calls from clients re: intervention and remedy issues
7/13/2016 Earls, Anita Sue	2.8 Research	re: timing and appropriate remedy
7/13/2016 Earls, Anita Sue	0.6 Conf.	with Allison & Emily re: brief on potential remedy & plaintiff questions
7/14/2016 Earls, Anita Sue	0.25 Meeting	W/Allison & Emily on Potential Petition for Rehearing
7/14/2016 Earls, Anita Sue	1.75 Legal Rese	on remedy for briefing to district court
7/14/2016 Earls, Anita Sue	1.5 Review	Petition for Rehearing
7/14/2016 Earls, Anita Sue	0.5 Review	Pleadings filed in District court
7/14/2016 Earls, Anita Sue	2.25 Legal Rese	for Motion to issue mandate
7/14/2016 Earls, Anita Sue	6.25 Draft	and file motion to issue mandate
7/15/2016 Earls, Anita Sue	0.5 Review	4th circuit orders issued
7/15/2016 Earls, Anita Sue	8.25 Draft	Brief in response to District Court order 7 8 2016
7/15/2016 Earls, Anita Sue	0.5 Review	Board of Elections letter regarding remedy
7/16/2016 Earls, Anita Sue	10 Research	and draft brief on remedy issues
7/17/2016 Earls, Anita Sue	5.4 Draft	brief on remedy issues
7/18/2016 Earls, Anita Sue	1.5 Edit	Brief on remedy and file with District Court
7/18/2016 Earls, Anita Sue	0.8 Review	Response to Order filed by Berger, et. al.
7/18/2016 Earls, Anita Sue	1.8 Edit	filing on motion to intervene
7/18/2016 Earls, Anita Sue	1 Research	extent of trial court remedial authority
7/18/2016 Earls, Anita Sue	0.75 Review	Response to Order filed by Wake Co. Bd. of Elections
7/19/2016 Earls, Anita Sue	1.2 Review	Pleadings filed in 4th circuit
7/26/2016 Earls, Anita Sue	0.3 Review	4th circuit denial of rehearing en banc

7/26/2016 Earls, Anita Sue	0.5 Email	to clients with update on status of case
7/26/2016 Earls, Anita Sue	1.5 Email	and telephone calls from clients re: impact of 4th Cir order
7/27/2016 Earls, Anita Sue	0.5 Review	District court order re: status conference
7/27/2016 Earls, Anita Sue	1 Email	to clients and telephone calls re: status conference
7/28/2016 Earls, Anita Sue	3 Meeting	with clients re: remedial issues & status conference
7/28/2016 Earls, Anita Sue	3.5 Legal Research	Re: remedy issues
7/29/2016 Earls, Anita Sue	2 Draft	Memorandum for district court on remedy issues
7/30/2016 Earls, Anita Sue	4.5 Research	and draft second brief on remedy issues
7/30/2016 Earls, Anita Sue	0.3 Email	to clients re: hearing on remedy
7/31/2016 Earls, Anita Sue	4 Draft	brief on remedy
8/1/2016 Earls, Anita Sue	9.25 Research	and draft brief on remedy
8/2/2016 Earls, Anita Sue	1.5 Edit	remedy brief and file
8/2/2016 Earls, Anita Sue	1 Travel	to and from Raleigh for hearing on remedy
8/2/2016 Earls, Anita Sue	1.5 Attend	prepare for and attend hearing in front of Dever on remedy
8/2/2016 Earls, Anita Sue	0.5 Meeting	with clients and counsel after hearing to discuss next steps
8/3/2016 Earls, Anita Sue	1.5 Research	factual question raised by court during 8/4/2016 hearing
8/3/2016 Earls, Anita Sue	2.5 Draft	and file post-hearing memorandum
8/3/2016 Earls, Anita Sue	1.5 Review	proposed remedial maps, conf. w/Fred McBride re: districts
8/3/2016 Earls, Anita Sue	0.25 Review	4th Circuit order on motions & mandate
8/3/2016 Earls, Anita Sue	0.5 Email	to opposing counsel Re: motion to strike
8/4/2016 Earls, Anita Sue	1.3 Review	McBride analysis of alternative maps
8/4/2016 Earls, Anita Sue	0.5 Review	District Court order re: request for briefing on remedy
8/4/2016 Earls, Anita Sue	0.3 Email	to clients re: alternative districts
8/4/2016 Earls, Anita Sue	0.75 Telephone	from clients re: potential district remedies
8/5/2016 Earls, Anita Sue	0.5 Conf.	with Allison re: motion to strike
8/5/2016 Earls, Anita Sue	1.8 Edit	and file Motion to strike & accompanying memorandum
8/5/2016 Earls, Anita Sue	5.2 Draft	Response to Aug. 4 Court Order
8/5/2016 Earls, Anita Sue	0.8 Edit	incorporate changes to Response
8/7/2016 Earls, Anita Sue	0.3 Review	Order of district court
8/7/2016 Earls, Anita Sue	0.2 Email	to Charles Marshall re: consent to motion for extension of time
8/8/2016 Earls, Anita Sue	0.2 Email	to Fred McBride re: obtaining shape files to evaluate districts
8/8/2016 Earls, Anita Sue	0.5 Email	to clients with status of case
8/9/2016 Earls, Anita Sue	0.3 Email	to opposing counsel
8/10/2016 Earls, Anita Sue	0.2 Email	to Charles Marshall re: motion for extension of time
8/11/2016 Earls, Anita Sue	0.3 Review	and respond to email from Marshall re: motion for extension of time
8/12/2016 Earls, Anita Sue	0.2 Email	to Emily re: filing motion for extension of time

8/15/2016	Earls, Anita Sue	0.5 Telephone	conference with clients re: status and next steps
8/17/2016	Earls, Anita Sue	0.5 Review	Bill of costs in 4th Circuit
8/18/2016	Earls, Anita Sue	0.5 Conf.	with Allison re: meeting with clients
9/21/2016	Earls, Anita Sue	0.2 Email	to Jowei Chen responding to question about trial testimony
9/22/2016	Earls, Anita Sue	1.5 Research	re: standards for fee petition
9/27/2016	Earls, Anita Sue	2.5 Research	on fees awards in voting rights cases
10/3/2016	Earls, Anita Sue	1.5 Review	time records to prepare fee petition
10/4/2016	Earls, Anita Sue	2.25 Review	staff time records relating to fee petition
10/5/2016	Earls, Anita Sue	2.6 Draft	summary of time and expenses
10/5/2016	Earls, Anita Sue	1 Meeting	with Charles Marshall re: fees
10/6/2016	Earls, Anita Sue	0.2 Email	to Charles Marshall re: additional extension of time
11/7/2016	Earls, Anita Sue	0.2 Email	and telephone call to C. Marshall re: fee petition
11/19/2016	Earls, Anita Sue	6.5 Review	fee petition materials
11/20/2016	Earls, Anita Sue	7 Review	time and expense records, eliminate double-entries,
11/21/2016	Earls, Anita Sue	3.5 Edit	fee petition & memorandum
11/22/2016	Earls, Anita Sue	4 Review	draft affidavits and fee records
TOTAL		390.8	

Allison Riggs - Wright/RWCA Time Records

Date	Timekeeper	Hours	Task	Description
3/25/2013	Allison Riggs	0.35	Draft	Letter for public hearing
3/25/2013	Allison Riggs	0.8	Draft	Public hearing letter
3/25/2013	Allison Riggs	3.18	Appear at Hearing	finalizing testimony and attending hearing
5/8/2013	Allison Riggs	0.65	Mtg	school assignment zone alignment w/ CK
6/13/2013	Allison Riggs	1	Telephone call	calls/emails w/ Chris Ketchie re: final verison; call with N&O reporter
6/18/2013	Allison Riggs	0.5	Draft	complaint
6/19/2013	Allison Riggs	1.17	Draft	complaint
6/19/2013	Allison Riggs	0.55	Telephone call	call w/ client
6/20/2013	Allison Riggs	2.23	Legal Research	Larios Complaint
6/21/2013	Allison Riggs	0.7	Review	Larios litigation
6/24/2013	Allison Riggs	1	Review	Larios pleadings
6/24/2013	Allison Riggs	5.05	Draft	complaint
7/9/2013	Allison Riggs	0.7	Draft	complaint
8/12/2013	Allison Riggs	4.83	Draft	complaint; meet w/ CK re data
8/14/2013	Allison Riggs	4.52	Draft	complaint
8/22/2013	Allison Riggs	2	Filing in office	finishing and filing the complaint
8/22/2013	Allison Riggs	1.43	Draft	summons/corporate disclosure
8/23/2013	Allison Riggs	0.45	Filing in office	fixing ECF mistake
8/23/2013	Allison Riggs	1	Filing in office	filing corporate/financial disclosure statements
11/5/2013	Allison Riggs	0.67	Review	Ds answer to complaint
5/20/2014	Allison Riggs	1.25	Review	Draft of 4th Cir Appeals brief
5/20/2014	Allison Riggs	0.33	Call	Talking to Anita about 4th Cir appeals brief
7/1/2014	Allison Riggs	1	Review	Defs' 4th Cir brief
11/19/2014	Allison Riggs	0.37	Telephone call	w/ potential judge for moot for Anita's 4th Cir. argument
11/20/2014	Allison Riggs	0.5	email to	2 potential judges re: moot
11/24/2014	Allison Riggs	0.25	email to	potential judge re serving as a moot judge
11/24/2014	Allison Riggs	0.42	Telephone call	w/ potential judge and follow up email with materials for moot
11/24/2014	Allison Riggs	2	Filing in office	prepping case notebooks and briefing notebooks for 4th Cir. arguments
11/24/2014	Allison Riggs	0.25	Telephone call	w/ potential judge and follow up email about potential moot involvement
12/1/2014	Allison Riggs	0.25	email to	call and email to potential judge about moot

12/1/2014 Allison Riggs	0.33 email to	email and call to potential judge about moot
12/1/2014 Allison Riggs	0.27 email to	telephone call and email to NCCU about using moot courtroom
12/1/2014 Allison Riggs	0.25 email to	email and call to potential judge about moot on Friday
12/1/2014 Allison Riggs	0.28 email to	email and call to potential judge about internal moot on Thursday
12/2/2014 Allison Riggs	0.17 email to	email to potential judges about moot on Friday
12/3/2014 Allison Riggs	0.2 email to	telephone call and email to NCCU about using moot courtroom
12/3/2014 Allison Riggs	0.17 email to	potential judges about moot on Friday
12/3/2014 Allison Riggs	0.2 email to	email and call to potential judge re moot
12/4/2014 Allison Riggs	1.17 Attend	internal moot for Anita's argument
12/4/2014 Allison Riggs	0.75 Draft	mock state argument
12/4/2014 Allison Riggs	0.58 Review	appellate pleadings
12/4/2014 Allison Riggs	0.25 Draft	questions for Anita at internal moot
12/5/2014 Allison Riggs	1.83 Attend	moot at NCCU
12/8/2015 Allison Riggs	1 Draft	Reasons for Deviations cheat sheet for Anita
12/9/2014 Allison Riggs	3.17 Travel	to Richmond for argument
12/9/2014 Allison Riggs	1.5 Attend	last minute moot for Anita
12/9/2014 Allison Riggs	4.5 Prepare	Legal research and one-pagers for Anita's argument
12/9/2014 Allison Riggs	0.58 Telephone call	radio interview w/ WUNC about case
12/9/2014 Allison Riggs	0.25 Telephone call	answering media inquiries from News & Observer
12/9/2014 Allison Riggs	0.5 Prepare	gathering materials needed to bring to Richmond for argument
12/10/2014 Allison Riggs	4.25 Appear at Hearing	argument in 4th Circuit case, debrief after
12/10/2014 Allison Riggs	0.42 email to	moot judges updating them about the argument, response emails
12/10/2014 Allison Riggs	2.75 Travel	back from Richmond for argument
5/27/2015 Allison Riggs	1.25 Review	Wright opinion from Fourth Circuit
WRIGHT ONLY SUBTOTAL	66.02	
4/9/2015 Allison Riggs	1.25 Edit	Review and edit draft complaint
9/9/2015 Allison Riggs	1.67 Prepare	Prepare for 26(f) conference (discussion topics, suggested points of agreement)
9/11/2015 Allison Riggs	0.75 Attend	26(f) conference
9/14/2015 Allison Riggs	1.5 Review	Draft Discovery Plan - make suggested additions
9/25/2015 Allison Riggs	0.67 Edit	Final 26(a) disclosures
9/30/2015 Allison Riggs	0.75 Conference Call	Updating clients
10/1/2015 Allison Riggs	1.75 Attend	Travel to and attend scheduling conference w/ Judge in Raleigh

10/12/2015 Allison Riggs	1 Conference Call	W/ Dr. Chen about expert analysis
10/14/2015 Allison Riggs	0.67 Edit	Legislator subpoena attachments
10/15/2015 Allison Riggs	1.5 Draft	Chen retainer agreement
10/15/2015 Allison Riggs	0.33 Edit	Erika Churchill subpoena attachment
10/20/2015 Allison Riggs	1.33 Meeting	Interviewing potential witness Darren Jackson
10/28/2015 Allison Riggs	1.75 Meeting	Interviewing potential witness Amy Womble
10/28/2015 Allison Riggs	1.5 Meeting	Interviewing potential witness Grier Martin; travel from meeting
10/29/2015 Allison Riggs	1.5 Meeting	Interviewing potential witness John Burns; travel to meeting
10/29/2015 Allison Riggs	1.5 Meeting	Interviewing potential witness Dan Blue; travel from meeting
10/30/2015 Allison Riggs	0.5 Email to	Follow up for Amy Womble; gathering maps, stats
10/30/2015 Allison Riggs	1.5 Review	Review and provide feedback on draft Fairfax report
11/1/2015 Allison Riggs	0.5 Review	Review and provide feedback on later draft Fairfax report
11/1/2015 Allison Riggs	1.25 Call	phone call with Jowei Chen about report
11/6/2015 Allison Riggs	2.5 Legal Research	Opposition to Motion to Quash Subpoenas
11/9/2015 Allison Riggs	5.67 Draft	Opposition to Motion to Quash Subpoenas
11/10/2015 Allison Riggs	1.5 Meeting	Interviewing potential witness Greg Flynn
11/10/2015 Allison Riggs	1.5 Meeting	Interviewing potential witness Caroline Sullivan
11/10/2015 Allison Riggs	0.75 Draft	Pre-trial brief
11/10/2015 Allison Riggs	3 Legal Research	Opposition to Motion to Quash Subpoenas
11/10/2015 Allison Riggs	3.5 Draft	Opposition to Motion to Quash Subpoenas
11/10/2015 Allison Riggs	1.27 Edit	Revise and incorporate edits to Opposition to Motion to Quash Subpoenas
11/11/2015 Allison Riggs	2.25 Meeting	Interviewing potential witness James West; travel to meeting
11/11/2015 Allison Riggs	1.17 Call	Phone interview with potential witness Bill Fletcher
11/13/2016 Allison Riggs	1 Review	Transcript from 3/5 and 3/10 hearing on SB 181
11/16/2016 Allison Riggs	3 Review	Transcripts from 2013 hearings on SB 325
11/16/2016 Allison Riggs	1.5 Review	Transcripts from 3/11 and 3/12 hearing on SB 181, jot down notes
11/30/2015 Allison Riggs	4 Draft	Exhibit list, assemble exhibits
12/1/2015 Allison Riggs	2.25 Meeting	w/ paralegal Shannon Christian about support needs for RWCA trial
12/2/2015 Allison Riggs	3.33 Meeting	w/ paralegal Shannon Christian about exhibits for RWCA trial
12/3/2015 Allison Riggs	4.5 Analyze	School base attendance maps compared to district maps
12/3/2015 Allison Riggs	3 Legal Research	Pre-trial Brief and Conclusions of Law
12/4/2015 Allison Riggs	2.25 Meeting	w/ Jannet Barnes to prepare for trial testimony
12/4/2015 Allison Riggs	1.33 Draft	Draft trial witness schedule; assignment of attorneys to witnesses

12/4/2015 Allison Riggs	0.5 Draft	Trial witness list for Ds
12/4/2015 Allison Riggs	2.67 Draft	Pre-trial order
12/5/2015 Allison Riggs	1.25 Draft	Pre-trial order
12/5/2015 Allison Riggs	5.25 Draft	Pre-trial Brief
12/5/2015 Allison Riggs	6.25 Draft	Pre-Trial FoF/CoL
12/6/2015 Allison Riggs	9 Draft	Pre-trial Brief
12/6/2015 Allison Riggs	1.67 Prepare	Find missing exhibits for exhibit notebook compilation
12/6/2015 Allison Riggs	0.33 Edit	Exhibit list
12/6/2015 Allison Riggs	1 Call	Phone interview w/ potential witness Gerry Cohen
12/6/2015 Allison Riggs	1 Call	Phone interview w/ potential witness Perry Woods
12/7/2015 Allison Riggs	3.75 Draft	Pre-Trial FoF/CoL
12/7/2015 Allison Riggs	2 Edit	Revise and incorporate edits to pre-trial brief
12/7/2015 Allison Riggs	2.83 Edit	Revise and incorporate edits to FoF/CoL
12/7/2015 Allison Riggs	0.5 File	Pre-trial brief; Pre-trial CoL/FoF; appendices
12/8/2015 Allison Riggs	0.75 Review	Ds Pretrial Brief
12/8/2015 Allison Riggs	3.5 Legal Research	For Pre-Trial Response Brief
12/8/2015 Allison Riggs	7 Draft	Pre-Trial Response Brief
12/9/2015 Allison Riggs	2 Legal Research	Pre-Trial Response Brief
12/9/2015 Allison Riggs	8 Draft	Pre-Trial Response Brief
12/9/2015 Allison Riggs	2.17 Edit	edit Pre-Trial Response Brief; incorporate edits; file
12/10/2016 Allison Riggs	2.5 Attend	PreTrial Conference
12/10/2015 Allison Riggs	1.25 Meeting	Trial team meeting; prep to-do list for
12/10/2015 Allison Riggs	0.75 Review	Review and edit Joint Stips
12/10/2015 Allison Riggs	1.5 Meeting	witness prep with John Burns
12/10/2015 Allison Riggs	1 Draft	Blue outline examination
12/11/2015 Allison Riggs	1.66 Meeting	witness prep with Dan Blue
12/11/2015 Allison Riggs	1.75 Draft	Burns outline examination
12/11/2015 Allison Riggs	3 Meeting	witness prep with Amy Womble
12/11/2015 Allison Riggs	1 Meeting	W/ Fred re: demonstratives for Womble testimony
12/12/2015 Allison Riggs	2.17 Meeting	w/ trial witness Bill Fletcher
12/12/2015 Allison Riggs	1.25 Draft	Trial Prep Supplies and Tasks List
12/12/2015 Allison Riggs	0.75 Call	w/ Amy Womble about testimony
12/12/2015 Allison Riggs	1.5 Draft	Barnes examination outline
12/13/2015 Allison Riggs	2.25 Meeting	Working with Kinkos staff on demonstratives

12/13/2015 Allison Riggs	2.33 Draft	Fletcher examination outline
12/13/2015 Allison Riggs	2.25 Edit	Edit the Kushner/Jackson examination outlines for George
12/13/2015 Allison Riggs	1.83 Draft	West examination outline
12/14/2015 Allison Riggs	6 Prepare	Trial prep; witness prep
12/14/2015 Allison Riggs	1.25 Edit	Revisions and additions to joint stip
12/14/2015 Allison Riggs	0.83 Edit	Edit the Jensen outline for George
12/14/2015 Allison Riggs	5.16 Prepare	Trial prep; opening argument
		Revisions to trial exhibit list and correspondence w/ opposing counsel
12/15/2015 Allison Riggs	0.83 Edit	about the same
12/15/2015 Allison Riggs	7.25 Prepare	Trial prep; packing up materials; witness prep
12/15/2015 Allison Riggs	6.66 Prepare	Trial prep; exhibit binders; opening argument
12/16/2015 Allison Riggs	1 Prepare	final prep and review for opening argument
12/16/2015 Allison Riggs	9 Attend	first day of trial
		updating exhibit list; reviewing late disclosed legislative production; prep
12/16/2015 Allison Riggs	4.75 Prepare	for witnesses on 2nd day of trial
12/17/2015 Allison Riggs	6 Attend	second day of trial
		Research for closing arguments; powerpoint for closing arguments;
12/17/2015 Allison Riggs	6.25 Prepare	practice closing arguments; final exhibit list and additions to notebook
12/18/2015 Allison Riggs	1 Meeting	final prep for closing arguments
12/18/2015 Allison Riggs	2 Prepare	third day of trial
1/29/2016 Allison Riggs	1 Review	Reviewing late produced discovery from legislators
2/26/2016 Allison Riggs	2.25 Review	RWCA decision from D/C
2/26/2016 Allison Riggs	1 Prepare	Attempts to convert decision into email-able size for clients
2/26/2016 Allison Riggs	1.25 Call	Talk with individual clients about decision
2/27/2016 Allison Riggs	0.75 Call	Talk with individual clients about decision
3/2/2016 Allison Riggs	0.5 Conf Call	Talk with all clients about decision
3/2/2016 Allison Riggs	1.166 Meet	Litigation team meeting about decision and next steps
3/3/2016 Allison Riggs	0.25 Call	Update individual client on decision
3/8/2016 Allison Riggs	0.166 Email	To expert (Chen) re: D/C decision
		Review Emily's research on consolidation on appeal and filing order; email
3/9/2016 Allison Riggs	0.5 Review	to Anita about same
3/9/2016 Allison Riggs	0.33 Review	Review Emily's draft issues on appeal
3/10/2016 Allison Riggs	0.33 Call	Update expert on D/C decision

3/28/2016 Allison Riggs	1.25 Review	Draft consolidation motions, corporate disclosures, docketing statements, notice of constitutional challenges
3/28/2016 Allison Riggs	0.75 Edit	Editing motion to expedite appeal
3/28/2016 Allison Riggs	0.25 Call	W/opposing counsel re: motion to expedite (voicemail + returned call)
3/28/2016 Allison Riggs	0.17 File	Draft and file notice of appearance
4/5/2016 Allison Riggs	2 Legal Research	Legal research for opening brief
4/6/2016 Allison Riggs	5.5 Draft	Draft Appellants Opening Brief
4/6/2016 Allison Riggs	0.1 Email	Setting up conference call re JA
4/7/2016 Allison Riggs	0.75 Meet	meet w/Emily about assembling JA
4/8/2016 Allison Riggs	6.33 Draft	Draft Appellants Opening Brief
4/8/2016 Allison Riggs	3 Legal Research	Legal research for opening brief
4/8/2016 Allison Riggs	0.33 Conf Call	Prep for and call w/Opposing counsel re JA
4/9/2016 Allison Riggs	8.75 Draft	Draft Appellants Opening Brief
4/9/2016 Allison Riggs	5 Legal Research	Legal research for opening brief
4/10/2016 Allison Riggs	7.75 Draft	Draft Appellants Opening Brief
4/10/2016 Allison Riggs	1.1 Review	Review draft JA List, track down missing documents
4/11/2016 Allison Riggs	1.33 Edit	Editing opening brief
4/12/2016 Allison Riggs	3.25 Draft	revising summary of argument for opening brief; further editing
4/13/2016 Allison Riggs	1.67 Edit	Incorporating Anita's edits to brief; my own further editing
4/13/2016 Allison Riggs	1.25 Review	Finalizing Joint Appendix
4/14/2016 Allison Riggs	1.5 Edit	Page proofing for brief; filling in missing citations
4/15/2016 Allison Riggs	1.25 Edit	final page proofing for opening brief
4/25/2016 Allison Riggs	1.33 Review	Reading Appellees's Brief
4/26/2016 Allison Riggs	1.33 Draft	Outlining notes and thoughts for reply brief
4/29/2016 Allison Riggs	2.5 Draft	Racial predominance section of reply brief
4/29/2016 Allison Riggs	3 Edit	Reply brief edits and page proofing
5/5/2016 Allison Riggs	1.25 Draft	Oral argument piece on racial gerrymandering
5/5/2016 Allison Riggs	1.5 Meeting	Internal moot for Fourth Circuit argument
5/8/2016 Allison Riggs	0.17 Email to	Correspondence with clients on oral argument
5/8/2016 Allison Riggs	2.75 Travel	Travel to Richmond
5/8/2016 Allison Riggs	4 Prepare	Prepare for oral argument
5/9/2016 Allison Riggs	4.25 Prepare	Prepare for oral argument
5/9/2016 Allison Riggs	0.6 Prepare	Check on panel assignment at court
5/9/2016 Allison Riggs	2 Argument	Oral argument in front of Fourth Circuit

5/9/2016 Allison Riggs	0.75 Meet	Debrief with clients on oral argument
5/9/2016 Allison Riggs	2.75 Travel	Travel back from Richmond
5/31/2016 Allison Riggs	0.25 Review	Court's request for exhibit
5/31/2016 Allison Riggs	0.75 Research	Find exhibit and pull for court
6/2/2016 Allison Riggs	0.166 Edit	Edit responses to Court's request for exhibit
7/1/2016 Allison Riggs	1.25 Review	Read Fourth Circuit opinion
7/1/2016 Allison Riggs	1.5 Confer	Discuss Fourth Circuit opinion w/ clients
7/7/2016 Allison Riggs	1.25 Legal Research	Filing for taxable costs and non-taxable costs
7/8/2016 Allison Riggs	2.5 Legal Research	Attorney's fees application
		compile time records and review financial records for attorney's fees application
7/8/2016 Allison Riggs	5 Prepare	
7/8/2016 Allison Riggs	1 Review	Order from District Court on remedy
7/11/2016 Allison Riggs	0.5 Telephone Call	to potential declarants in support of remedy brief
7/11/2016 Allison Riggs	0.25 Telephone Call	w/ Gerry Hebert about declaration in support of fees
7/11/2016 Allison Riggs	1.75 Draft	Draft Hebert's declaration based on his opinions conveyed by phone
		telephone call and follow up emails w/ Eddie Speas about declaration in support
7/12/2016 Allison Riggs	0.33 Telephone Call	
7/12/2016 Allison Riggs	1.5 Draft	initial draft of Speas declaration based on information conveyed via phone
7/14/2016 Allison Riggs	0.25 Meeting	W/Earls and Seawell on Petition for Rehearing about to be filed
7/14/2016 Allison Riggs	1.25 Legal Research	on remedy for briefing to district court
7/14/2016 Allison Riggs	2.5 Legal Research	on legislators motion to intervene in appellate stage
7/14/2016 Allison Riggs	1 Legal Research	on legislative standing for intervention
7/15/2016 Allison Riggs	6.5 Draft	Opposition to Motion to Intervene in 4th Cir
7/18/2016 Allison Riggs	1.17 Edit	Response to DC's 7 8 16 order
7/18/2016 Allison Riggs	2 Draft	Finish drafting opposition to motion to intervene
7/18/2016 Allison Riggs	1.75 Edits	editing the opposition to motion to intervene
7/26/2016 Allison Riggs	0.5 Draft	RWCA press release
7/29/2016 Allison Riggs	1 Legal Research	on standards for writ of prohibition in 4th Cir
8/3/2016 Allison Riggs	0.5 Travel	to Raleigh for hearing on remedy
8/3/2016 Allison Riggs	1.5 Attend	prepare for and attend hearing in front of Dever on remedy
8/3/2016 Allison Riggs	0.5 Meeting	confer with clients after hearing
8/3/2016 Allison Riggs	0.5 Travel	Travel back to Durham after hearing
8/5/2016 Allison Riggs	7 Draft	Memo in support of motion to strike alternate map

8/8/2016 Allison Riggs	0.75 Telephone Call	w/ Joseph Fedrowitz about a declaration re: implementation of different remedial options
8/8/2016 Allison Riggs	1 Draft	declaration of Joseph Fedrowitz
8/15/2016 Allison Riggs	0.5 Telephone Call	w/ RWCA client re: remedy
8/17/2016 Allison Riggs	1.67 Research	rules on appellate bill of costs
8/17/2016 Allison Riggs	2.5 Draft	Fourth Circuit bill of costs
8/17/2016 Allison Riggs	1.5 Prepare	supporting documents for 4th Cir bill of costs
8/18/2016 Allison Riggs	0.5 Conf Call	w/clients
8/18/2016 Allison Riggs	0.75 Travel	to Raleigh for RWCA meeting
8/18/2016 Allison Riggs	1.5 Meeting	w/RWCA clients
8/18/2016 Allison Riggs	0.75 Travel	to Raleigh for RWCA meeting
8/19/2016 Allison Riggs	0.75 Review	8/19 letter from Shannon Joseph
8/19/2016 Allison Riggs	0.75 Telephone Call	w/ Marshall about Sullivan letter
8/21/2016 Allison Riggs	0.5 Telephone Call	w/clients
8/22/2016 Allison Riggs	1 Telephone Call	w/ client about remedy situation
8/22/2016 Allison Riggs	1.25 Telephone Call	w/ group of clients about remedy situation
8/22/2016 Allison Riggs	0.5 Email to	Anita updating her on case developments
8/22/2016 Allison Riggs	0.5 Telephone Call	w/ Marshall about Sullivan motion
8/22/2016 Allison Riggs	0.66 Email to	Clients w/ update
10/4/2016 Allison Riggs	3.5 Prepare	expense records for fees petition
		Assemble George, Emily and my time records for prep for meeting w/ Marshall
10/4/2016 Allison Riggs	0.75 Prepare	
10/5/2016 Allison Riggs	1 Meeting	W/ Charles Marshall about fees petition
11/16/2016 Allison Riggs	0.25 Telephone Call	and follow up email re: Crowell affidavit in support of fees
		Draft initial version of Crowell declaration and send to him for his additions/edits
11/18/2016 Allison Riggs	1 Draft	
11/18/2016 Allison Riggs	0.33 Finalize	Hebert declaration and send to him
11/20/2016 Allison Riggs	0.5 Finalize	Speas declaration and send to him
11/22/2016 Allison Riggs	4.5 Draft	District Court Bill of Costs, AJR affidavit in support, and memo in support
11/23/2016 Allison Riggs	2.5 Draft	Riggs declaration in support of fees application

RWCA/Wright Subtotal

389.11

RWCA/Wright Time Records - Emily Seawell

Date	Case	Work description	Hours
3/5/2015	RWCA	Attended legislative committee hearing on SB181	0.5
3/10/2015	RWCA	Attended legislative committee hearing on SB181	0.5
3/11/2015	RWCA	Listened to and took notes on legislative floor debate on SB181	0.5
3/12/2015	RWCA	Listened to and took notes on legislative floor debate on SB181	0.33
3/23/2015	RWCA	Drafted bill analysis for SB181	1
3/31/2015	RWCA	Updated bill analysis for SB181	0.5
3/31/2015	RWCA	Attended legislative committee hearing on SB181	1
4/1/2015	RWCA	Listened to legislative floor debate on SB181	0.75
4/2/2015	RWCA	Tracked bill status for SB181	0.5
4/9/2015	RWCA	Read and made suggestions for draft complaint in RWCA	0.75
6/10/2015	Wright	Read petition for rehearing	0.33
6/17/2015	Wright	Read order requiring response to petition for rehearing	0.08
6/24/2015	Wright	Researched and drafted language for proposition that State may not file a response to petition	2
6/25/2015	Wright	Researched and drafted language for proposition that State may not file a response to petition	2
6/29/2015	Wright	Cite checked and edited response to petition for rehearing	4
6/29/2015	Wright	Read State's response to petition for rehearing	0.33
6/29/2015	Wright	Researched Fourth Circuit local rules on formatting of petitions for rehearing	0.33
7/16/2015	Wright	Read Fourth Circuit order on petition for rehearing	0.08
8/3/2015	RWCA	Read Defendant's Answer	0.25
9/11/2015	Both	Participated in call with defense counsel about 26(f) plan	0.75
9/11/2015	Both	Edited draft 26(f) reports	0.5
9/14/2015	Both	Edited draft 26(f) reports	0.25
9/16/2015	Both	Participated in call with defense counsel about 26(f) plan	0.5
9/18/2015	Both	Reviewed revised 26(f) report	0.25
9/24/2015	Both	Drafted initial disclosures	0.5
9/25/2015	Both	Served initial disclosures on defense counsel	0.17
9/25/2015	Both	Read Defendant's initial disclosures	0.17
9/30/2015	Both	Emails regarding submitted 26(f) reports	0.17
9/30/2015	Both	Read court order re: scheduling conference	0.08
9/30/2015	Both	Emailed clients regarding client call	0.25
9/30/2015	Both	Client call	0.75

10/1/2015	Both	Printed and compiled pleadings notebook for scheduling conference	0.5
10/1/2015	Both	Attended scheduling conference	1
10/5/2015	Both	Read correspondence re: exit polling	0.08
10/11/2015	Both	Call with Jowei Chen	0.5
10/13/2015	Both	Arranged conference space for witness interviews	0.33
10/13/2015	Both	Arranged interview with Rosa Gill	0.17
10/13/2015	Both	Arranged interview with Josh Stein	0.17
10/13/2015	Both	Researched and drafted documents on legislative testimony and past election results	4
10/14/2015	Both	Drafted subpoenas for legislators and staff	2
10/15/2015	Both	Arranged interview with Rosa Gill	0.17
10/15/2015	Both	Arranged interview with Tom Jensen	0.17
10/15/2015	Both	Arranged interview with Darren Jackson	0.17
10/15/2015	Both	Arranged interview with Yevonne Brannon	0.17
10/15/2015	Both	Arranged interview with Amy Womble	0.17
10/15/2015	Both	Drafted subpoenas and researched rules on service	1
10/15/2015	Both	Emailed legislative counsel re: serving subpoenas	0.25
10/16/2015	Both	Emails re: witness interview schedule and supporting documents	0.17
10/16/2015	Both	Compiled and printed supporting documents for witness interviews	2
10/16/2015	Both	Witness interviews	6
10/16/2015	Both	Meeting with Fred McBride re: alternate maps	0.17
10/16/2015	Both	Arranged interview with Tom Jensen	0.17
10/16/2015	Both	Arranged interview with Brian Fitzsimmons	0.17
10/16/2015	Both	Arranged interview with Earl Johnson	0.17
10/16/2015	Both	Arranged interview with Yevonne Brannon	0.17
10/19/2015	Both	Emails re: witness interview schedule and supporting documents	0.25
10/19/2015	Both	Arranged interview with John Burns	0.17
10/19/2015	Both	Arranged interview with James West	0.17
10/19/2015	Both	Arranged interview with Josh Stein	0.17
10/19/2015	Both	Arranged interview with Tom Oxholm	0.17
10/19/2015	Both	Emailed legislative counsel re: serving subpoenas	0.25
10/20/2015	Both	Emailed legislative counsel re: serving subpoenas	0.25
10/20/2015	Both	Emails re: witness interview schedule and supporting documents	0.25
10/20/2015	Both	Compiled and printed supporting documents for witness interviews	2
10/20/2015	Both	Researched requirements for service of subpoenas and updated legislative subpoenas	1
10/20/2015	Both	Requested audio recordings of legislative debate on SB325 and SB181	1

10/20/2015	Both	Arranged interview with Josh Stein	0.17
10/20/2015	Both	Arranged interview with Dan Blue	0.17
10/20/2015	Both	Arranged interview with Grier Martin	0.17
10/20/2015	Both	Attended witness interviews	3
10/21/2015	Both	Arranged interview with Grier Martin	0.17
10/21/2015	Both	Arranged interview with Dan Blue	0.17
10/21/2015	Both	Typed and emailed notes from Rosa Gill interview	0.5
10/21/2015	Both	Compiled and printed supporting documents for witness interviews	2
10/21/2015	Both	Compiled timeline for expert witness use	1
10/21/2015	Both	Served subpoenas on legislative counsel and mailed to legislative staff	1.5
10/21/2015	Wright	Read Complaint	0.75
10/21/2015	Wright	Read order on motion to dismiss	0.75
10/21/2015	Wright	Read Fourth Circuit opinion	0.75
10/22/2015	Both	Arranged conference space for witness interviews	0.33
10/23/2015	Both	Arranged interview with John Burns	0.17
10/23/2015	Both	Arranged interview with Caroline Sullivan	0.17
10/23/2015	Both	Arranged interview with James West	0.17
10/23/2015	Both	Arranged interview with Bill Fletcher	0.17
10/27/2015	Both	Arranged interview with Amy Womble	0.17
10/27/2015	Both	Arranged conference space for witness interviews	0.25
10/28/2015	Both	Arranged conference space for witness interviews	0.25
10/29/2015	Both	Read draft expert report	0.5
10/30/2015	Both	Emailed legislative counsel re: subpoena service and letters filed with the court	0.25
10/30/2015	Both	Served corrected subpoena on legislative counsel	1
10/30/2015	Both	Picked up audio recordings and pulled committee notes from legislative debate on SB325 and SB181	2
10/30/2015	Both	Listened to and took notes on legislative debate recordings	4
10/30/2015	Both	Updated timeline	0.25
11/2/2015	Both	Arranged meeting with Tom Oxholm	0.17
11/2/2015	Both	Arranged meeting with Gerry Cohen	0.17
11/2/2015	Both	Drafted RFPs for Gary Sims	0.75
11/2/2015	Both	Listened to and took notes on legislative debate recordings	4
11/3/2015	Both	Listened to and took notes on legislative debate recordings	2
11/3/2015	Both	Requested transcripts of legislative debates on SB325 and SB181	0.75
11/4/2015	Both	Emails re: transcripts of legislative debates on SB325 and SB181	0.25
11/4/2015	Both	Read motion to quash legislative subpoenas	0.5

11/4/2015	Both	Emailed legislative counsel re: public records request	0.25
11/4/2015	Both	Arranged interview with James West	0.17
11/4/2015	Both	Arranged interview with Tom Oxholm	0.17
11/4/2015	Both	Arranged interview with Bill Fletcher	0.17
11/4/2015	Both	Arranged interview with Gerry Cohen	0.17
11/4/2015	Both	Arranged interview with Harvey Schmitt	0.17
11/4/2015	Both	Acquired Womble map of split municipalities	0.33
11/5/2015	Both	Searched legislative transcripts and compiled relevant testimony for potential witness outreach	1
11/5/2015	Both	Researched elected officials in Wake municipalities for potential witness outreach	0.75
11/5/2015	Both	Coordinated intern project to compile news articles related to SB181 and SB325	0.25
11/5/2015	Both	Arranged interview with Caroline Sullivan	0.17
11/5/2015	Both	Arranged interview with Gerry Cohen	0.17
11/5/2015	Both	Arranged interview with Greg Flynn	0.17
11/5/2015	Both	Arranged interview with Dustin Ingalls	0.17
11/5/2015	Both	Arranged conference space for witness interviews	0.25
11/6/2015	Both	Arranged interview with Bill Fletcher	0.17
11/9/2015	Both	Arranged interview with Dustin Ingalls	0.17
11/10/2015	Both	Arranged interview with Greg Flynn	0.17
11/10/2015	Both	Arranged interview with James West	0.17
11/10/2015	Both	Emails re: transcripts of legislative debates on SB325 and SB181	0.5
11/10/2015	Both	Emailed legislative counsel re: public records request	0.17
11/10/2015	Both	Researched local rules for citations to unpublished authority	0.5
11/10/2015	Both	Cite checked and edited response to motion to quash, and compiled exhibits	2
11/11/2015	Both	Attended witness interviews	4
11/11/2015	Both	Requested audio recordings of committee meetings on SB325 and SB181	1
11/12/2015	Both	Requested audio recordings of committee meetings on SB325 and SB181	0.33
11/12/2015	Both	Read draft of pre-trial brief	2
11/13/2015	Both	Picked up audio recordings of committee meetings on SB325 and SB181	1
11/13/2015	Both	Call with defense counsel	0.75
11/13/2015	Both	Drafted amended initial disclosures and supplemental disclosures, and served on defense counsel	2
11/16/2015	Both	Read Defendant's RFP responses and amended disclosures	0.5
11/16/2015	Both	Reviewed search terms for RFPs and suggested additions	0.33
11/18/2015	Both	Requested audio recordings of committee meetings on SB325 and SB181	0.25
11/19/2015	Both	Requested audio recordings of committee meetings on SB325 and SB181	0.25
11/25/2015	Both	Researched and pulled demographic reports for Wake County	0.75

11/30/2015	Both	Trial team meeting re: roles and responsibilities	1
11/30/2015	Both	Arranged interview with Jannet Barnes	0.17
11/30/2015	Both	Arranged interview with Beverley Clark	0.17
11/30/2015	Both	Emails re: transcripts of legislative debates on SB325 and SB181	0.5
11/30/2015	Both	Edited witness list	0.25
11/30/2015	Both	Read case management order	0.17
11/30/2015	Both	Researched date of legislative press release re: SB181	0.5
11/30/2015	Both	Reviewed legislative document production	2
12/1/2015	Both	Excerpted transcripts received from legislature for expert witness use	1
12/1/2015	Both	Emails re: subpoenas and legislator comments in the media	0.17
12/1/2015	Both	Correspondence with school board counsel to acquire base attendance maps	0.5
12/2/2015	Both	Organizing exhibits	0.5
12/2/2015	Both	Emails re: witness contact information	0.33
12/2/2015	Both	Drafted trial subpoenas for witnesses	0.5
12/3/2015	Both	Coordinated paralegal calls to arrange witness interviews	0.25
12/3/2015	Both	Correspondence with school board counsel to acquire base attendance maps	0.25
12/3/2015	Both	Drafted facts section for pretrial brief/FoF	8
12/3/2015	Both	Drafted interview outline for Jannet Barnes	1
12/3/2015	Both	Compiled and printed supporting documents for witness interviews	1
12/4/2015	Both	Interviewed Beverley Clark	1
12/4/2015	Both	Typed and emailed notes from Beverley Clark interview	0.5
12/4/2015	Both	Reviewed witness list	0.25
12/4/2015	Both	Reviewed draft trial schedule	0.17
12/4/2015	Both	Attempted to locate missing exhibits	0.5
12/5/2015	Both	Drafted pretrial FoF	8
12/6/2015	Both	Cite checked and edited pretrial brief	9
12/7/2015	Both	Edited and added cites to pretrial brief	4
12/7/2015	Both	Added cites in pretrial FoF and CoL	2
12/7/2015	Both	Drafted joint stipulations of fact	4
12/7/2015	Both	Searched legislative transcripts for quotes relevant to racial gerrymandering claim	0.33
12/7/2015	Both	Coordinated paralegal calls to arrange witness interviews	0.25
12/8/2015	Both	Drafted joint stipulations of fact	6
12/8/2015	Both	Researched previous maps for commission and school board	0.75
12/8/2015	Both	Edited and served subpoenas for school board witnesses	1
12/8/2015	Both	Researched untimely disclosure of witnesses and prejudice	1

12/9/2015	Both	Call with legislative counsel	0.5
12/9/2015	Both	Compiled and printed supporting documents for witness interviews	2
12/9/2015	Both	Emails re: previous and current maps for commission and school board	0.17
12/9/2015	Both	Edited and served subpoenas for commission witnesses	0.5
12/10/2015	Both	Updated draft of joint stipulations of fact	2
12/10/2015	Both	Coordinated paralegal calls to arrange witness interviews	0.25
12/10/2015	Both	Trial team meeting re: roles and responsibilities	1
12/10/2015	Both	Compiled and printed supporting documents for witness interviews	2
12/10/2015	Both	Attended final pretrial conference	1
12/10/2015	Both	Correspondence with Beverley Clark re: base attendance area maps	0.25
12/11/2015	Both	Email with court clerk re: exhibit list in Excel format	0.33
12/11/2015	Both	Emails re: legislative process timeline	0.17
12/11/2015	Both	Research on legislative votes	0.25
12/11/2015	Both	Compiled and printed supporting documents for witness prep	2
12/12/2015	Both	Drafted timeline demonstratives for SB181 and SB325	2
12/12/2015	Both	Research on county election methods	1
12/13/2015	Both	Emails re: witness contact information	0.33
12/14/2015	Both	Emails re: trial team contact information	0.17
12/14/2015	Both	Reviewed legislative document production	2
12/14/2015	Both	Drafted and served subpoena on Darren Jackson	0.5
12/14/2015	Both	Compiled and printed supporting documents for witness prep	2
12/14/2015	Both	Cite checked and edited first amended stipulations	1
12/15/2015	Both	Reviewed legislative document production	1
12/15/2015	Both	Emails re: witness contact information	0.17
12/15/2015	Both	Emails re: exhibit numbers	0.33
12/15/2015	Both	Printing exhibits	0.5
12/16/2015	Both	Attended trial and took notes	6
12/17/2015	Both	Attended trial and took notes	6
12/17/2015	Both	Responded to media request for copies of complaints	0.25
12/17/2015	Both	Researched adverse inferences	1
12/17/2015	Both	Drafted slide on Arlington Heights factors	1.5
12/18/2015	Both	Attended trial and took notes	2
12/21/2015	Both	Responded to witness interview inquiry	0.33
		RWCA ONLY time	6.58

		Wright ONLY time	11.4
		Consolidated Cases time	175.89
		PRE-BAR EXAM TOTAL	193.87
2/29/2016	Both	Read district court opinion	4
3/1/2016	Both	Email re: client call	0.5
3/2/2016	Both	Email re: client call	0.17
3/2/2016	Both	Client call	0.75
3/3/2016	Both	Drafted talking points for clients	0.75
3/10/2016	Both	Drafted notices of appeal and docketing statements	2
3/23/2016	Both	Drafted request to consolidate; legal research for the same; started drafting docketing statement; call to clerk's office re: order of filing	6
3/25/2016	Both	Drafted representation and corporate disclosure statements, and notice of constitutional challenge	3
3/28/2016	Both	Drafted Docketing Statements in Wright/RWCA; edited notice of constitutional challenge; drafted notices of appearances; drafted corporate disclosure forms; drafted motion to expedite; edited request to consolidate	10
4/7/2016	Both	Call with EDNC clerk's office re: file size of opinion	0.33
4/7/2016	Both	Call with printer re: file size of opinion	0.17
4/7/2015	Both	Drafted table of contents for JA	6
4/7/2016	Both	Drafted oral argument acknowledgement form	1
4/8/2016	Both	Call with defense counsel	0.5
4/8/2016	Both	Excerpted legislative transcripts and election results for JA	8
4/8/2016	Both	Call with Fourth Circuit clerk re: oral argument acknowledgement form	0.17
4/8/2016	Both	Updated oral argument acknowledgement form	0.25
4/9/2016	Both	Emails re: legislator questions about deviations	0.33
4/9/2016	Both	Emails re: Stam statements	0.33
4/10/2016	Both	Excerpted trial transcripts for JA	10
4/11/2016	Both	Email to defense counsel re: JA	0.25
4/11/2016	Both	Compiled JA	10
4/12/2016	Both	Compiled JA	16
4/13/2016	Both	Coordinated with printer re: JA and brief	0.5
4/13/2016	Both	Coordinated with defense counsel re: JA	0.33
4/13/2016	Both	Checked and added cites to appellants' brief	18
4/14/2016	Both	Checked and added cites to appellants' brief	6

4/14/2016	Both	Compiled JA	1
4/14/2016	Both	Coordinated with printer re: JA and brief	0.5
4/14/2016	Both	Coordinated with defense counsel re: JA	0.33
4/15/2016	Both	Coordinated with printer re: JA and brief	1
4/25/2016	Both	Read appellees' brief	0.75
4/26/2016	Both	Made suggestions for reply brief	0.75
4/29/2016	Both	Helped draft, edited, and cite checked reply brief	3.5
5/6/2016	Both	Researched and drafted notes on remedy	3
5/7/2016	Both	Researched and drafted notes on remedy	2
5/8/2016	Both	Researched and drafted notes on remedy	1
5/8/2016	Both	Researched Fourth Circuit judges	0.25
5/9/2016	Both	Travel to Richmond for oral argument	2.5
5/9/2016	Both	Attended oral argument	1.5
5/9/2016	Both	Travel from Richmond after oral argument	2.5
6/1/2016	Both	Researched missing trial exhibit requested by Fourth Circuit	0.5
6/2/2016	Both	Read and edited response to court's request	0.33
7/1/2016	Both	Read Fourth Circuit opinion	1
7/6/2016	Both	Conference call with clients	1
7/6/2016	Both	Researched requests for costs and fees in E.D.N.C. and Fourth Circuit	1
7/7/2016	Both	Pulled and compiled time records to date in both cases, updated CV for inclusion in fee petition	1.5
7/11/2016	Both	Drafted motion for extension of time and proposed order	2
7/12/2016	Both	Researched attorney fees, expert fees, and litigation expenses in E.D.N.C. and Fourth Circuit	5
7/13/2016	Both	Met with trial team to discuss media strategy	0.25
7/13/2016	Both	Coordinated intern research assignments for remedial briefing	0.33
7/14/2016	Both	Met with trial team to discuss response to legislators' motion to intervene	0.25
7/14/2016	Both	Edited/helped write draft of motion to issue mandate	2.5
7/15/2016	Both	Read SBE letter on remedy	0.1
7/18/2016	Both	Filled in citations and edited remedial brief	2.5
7/19/2016	Both	Filled in citations, edited, and filed response to motion to intervene	4.5
8/2/2016	Both	Emailed previous research on election history	0.1
8/2/2016	Both	Attended hearing on remedy	2
8/2/2016	Both	Researched school board election dates and legislative history in 2013	0.25
8/3/2016	Both	Proofread post-hearing memorandum	0.1
8/4/2016	Both	Read court order on remedy	0.1
8/4/2016	Both	Emailed Fred McBride plans submitted by legislators	0.1

8/4/2016	Both	Spoke to two potential witnesses about providing affidavits on remedial maps	0.75
8/4/2016	Both	Coordinated intern research and drafting assignment on motion to strike	0.66
8/5/2016	Both	Met with Anita Earls about strategy for responding to remedial submissions	0.1
8/5/2016	Both	Drafted response to the Court's August 4 Order	4
8/5/2016	Both	Drafted part of memorandum in support of motion to strike	1
8/5/2016	Both	Edited and filled in cites on response to August 4 Order and memo in support of motion to strike	4
8/8/2016	Both	Called 4th Circuit clerk's office to inquire about procedures for filing writ	0.33
8/8/2016	Both	Drafted corporate disclosure statements to file with writ	1
8/8/2016	Both	Edited and filled in cites on petition for writ	2
8/8/2016	Both	Emailed updated legislative map files to Fred McBride	0.1
8/8/2016	Both	Searched trial record for information on precinct splits	0.25
8/8/2016	Both	Researched 4th Circuit rules for expediting appeals and drafted fact section of memo in support	4
8/9/2016	Both	Proofread amended petition for writ	0.25
8/9/2016	Both	Researched E.D.N.C. rules for extensions of time and proposed orders	2
8/10/2016	Both	Rewrote motion for extension of time and proposed order	3
8/11/2016	Both	Emailed with opposing counsel and updated consent motion for extension of time	1.5
8/12/2016	Both	Spoke with opposing counsel, updated consent motion for extension of time, and filed motion	0.5
8/17/2016	Both	Researched 4th Circuit rules for filing bill of costs	0.5
8/17/2016	Both	Proofread declaration in support of bill of costs	0.1
8/18/2016	Both	Read letter from proposed intervenor	0.25
8/19/2016	Both	Drafted talking points for potential media strategy	2
8/20/2016	Both	Drafted alternative talking points for potential media strategy	1
8/22/2016	Both	Read Defendant's response to letter from proposed intervenor	0.25
8/22/2016	Both	Read filings in support of intervention	0.5
8/23/2016	Both	Searched Plaintiffs' remedial filings for information on reverting to prior election method	0.5
8/25/2016	Both	Read court order denying intervention	0.25
9/22/2016	Both	Researched attorney fees, expert fees, and litigation expenses in E.D.N.C. and Fourth Circuit	2
9/23/2016	Both	Researched attorney fees, expert fees, and litigation expenses in E.D.N.C. and Fourth Circuit	3
9/26/2016	Both	Researched and drafted petition for attorney fees and costs	4
9/27/2016	Both	Researched and drafted petition for attorney fees and costs	3
10/3/2016	Both	Researched and drafted petition for attorney fees and costs	7
10/4/2016	Both	Drafted petition for attorney fees and costs	2
10/5/2016	Both	Pulled and compiled time records to date in both cases	1
11/13/2016	Both	Drafted fee petition	1.5
11/14/2016	Both	Drafted fee petition	3

11/21/2016	Both	Collected materials for fee petition and supporting documentation	1
11/22/2016	Both	Drafted internal declaration in support of fee petition	1.5
11/23/2016	Both	Edited, filled in cites and missing figures, and proofread fee petition; collected supporting materials	9
		POST BAR EXAM TOTAL	145.74
		Total Hours Spent	339.61

George Eppsteiner Time Records - RWCA/Wright

Case	Hours	User	Time Date	DOW	Task	Description
Wright/RWCA	0.6	Eppsteiner, George	12/4/2015	Fri	Analyze	Trial prep including identifying witnesses and finalizing same.
Wright/RWCA	0.8	Eppsteiner, George	12/7/2015	Mon	Analyze	Preparation for trial including begin prep for Kushner, Jackson, Jensen, and Fitzsimmons trial witnesses.
Wright/RWCA	0.5	Eppsteiner, George	12/7/2015	Mon	email to	Review numerous correspondence from opposing counsel regarding pretrial order.
Wright/RWCA	0.4	Eppsteiner, George	12/8/2015	Tue	Conf Call	Call with Christine Kushner regarding testifying at trial.
Wright/RWCA	0.3	Eppsteiner, George	12/8/2015	Tue	Conf Call	Call with Representative Jackson regarding testifying at trial.
Wright/RWCA	2.5	Eppsteiner, George	12/9/2015	Wed	Analyze	Begin drafting outlines for witness testimony and trial preparation.
Wright/RWCA	0.4	Eppsteiner, George	12/9/2015	Wed	Conf Call	Call with client and trial prep regarding same.
Wright/RWCA	1.5	Eppsteiner, George	12/10/2015	Thu	Analyze	Trial preparation including analysis of witnesses to testify and exhibits to use for witnesses and zoom mapping analysis.
Wright/RWCA	1	Eppsteiner, George	12/10/2015	Thu	Analyze	Review legislative transcripts in preparaiton for trial.
Wright/RWCA	0.5	Eppsteiner, George	12/11/2015	Fri	Analyze	Preparation for trial witness meetings.
Wright/RWCA	2.6	Eppsteiner, George	12/11/2015	Fri	Analyze	Preparation for Jackson testimony.
Wright/RWCA	10	Eppsteiner, George	12/12/2015	Sat	Witness pr	Preparation for trial including begin question outlines for Jackson and Kushner.
Wright/RWCA	4	Eppsteiner, George	12/13/2015	Sun	Prepare	Trial preparation including Fitzsimmons and Jensen outlines.
Wright/RWCA	6	Eppsteiner, George	12/14/2015	Mon	Attend	Meetings with Representative Jackson and Kushner in prep for trial.
Wright/RWCA	5.5	Eppsteiner, George	12/14/2015	Mon	Attend	preparation for trial including Fitzsimmons meeting, preparation of witness questions and exhibits.

Wright/RWCA	7.5	Eppsteiner, George	12/15/2015	Tue	Prepare	Continued trial prep including finalize questions and exhibits for Jackson, Jensen, Fitzsimmons, and Kushner testimony.
Wright/RWCA	6	Eppsteiner, George	12/15/2015	Tue	Prepare	Preparation for trial including review legislative produced documents.
Wright/RWCA	2	Eppsteiner, George	12/16/2015	Wed	Analyze	Preparation for morning witnesses.
Wright/RWCA	4	Eppsteiner, George	12/16/2015	Wed	Attend	Attend first day of trial.
Wright/RWCA	2	Eppsteiner, George	12/16/2015	Wed	Analyze	Preparation for day 2 of trial including preparation evidentiary objections memo.
Wright/RWCA	4	Eppsteiner, George	12/16/2015	Wed	Attend	Attend first day of trial.
Wright/RWCA	2.2	Eppsteiner, George	12/16/2015	Wed	Prepare	Prepare for expert witness testimony.
Wright/RWCA	1.5	Eppsteiner, George	12/17/2015	Thu	Prepare	Morning preparation for trial.
Wright/RWCA	2.5	Eppsteiner, George	12/17/2015	Thu	Attend	Attend day 2 of trial.
Wright/RWCA	4	Eppsteiner, George	12/17/2015	Thu	Draft	Prepare for closing arguments including draft memo on 5% deviation jurisdictions.
Wright/RWCA	2.5	Eppsteiner, George	12/17/2015	Thu	Attend	Attend day 2 of trial.
Wright/RWCA	4	Eppsteiner, George	12/17/2015	Thu	Draft	Continue preparation for closing arguments including continued drafting of memo on 5% deviation jurisdictions.
Wright/RWCA	1	Eppsteiner, George	12/18/2015	Fri	Attend	Morning preparation for closing argument including closing meeting.
Wright/RWCA	1	Eppsteiner, George	12/18/2015	Fri	Attend	Attend Plaintiffs closing argument.
Wright/RWCA	1	Eppsteiner, George	12/18/2015	Fri	Attend	Morning preparation for trial including discussion of closing argument strategy.
Wright/RWCA	0.2	Eppsteiner, George	3/28/2016	Mon	Draft	File notice of appearance for appeal.
Wright/RWCA	0.3	Eppsteiner, George	3/28/2016	Mon	Draft	Edits to appellate documents.
Wright/RWCA	0.4	Eppsteiner, George	4/6/2016	Wed	Analyze	Begin preparing appellate brief.
Wright/RWCA	0.4	Eppsteiner, George	4/6/2016	Wed	Attend	Analyze appellate filings including motion to expedite, granting of motion to expedite, briefing schedule.
Wright/RWCA	7.5	Eppsteiner, George	4/9/2016	Sat	Draft	Draft racial gerrymander section of appellate brief.
Wright/RWCA	1	Eppsteiner, George	4/21/2016	Thu	Analyze	Analyze appellate filings.
Wright/RWCA	1	Eppsteiner, George	4/21/2016	Thu	Analyze	Analyze appellate filings.
Wright/RWCA	0.8	Eppsteiner, George	4/22/2016	Fri	Analyze	Review record on appeal.

Wright/RWCA	0.8	Eppsteiner, George	4/22/2016	Fri	Analyze	Review record on appeal.
Wright/RWCA	1.8	Eppsteiner, George	4/26/2016	Tue	Analyze	Review briefs in preparation for drafting reply brief.
Wright/RWCA	1.8	Eppsteiner, George	4/26/2016	Tue	Draft	Review briefs in preparation for drafting reply brief.
Wright/RWCA	0.7	Eppsteiner, George	4/27/2016	Wed	Analyze	Draft outline for reply brief.
Wright/RWCA	0.8	Eppsteiner, George	4/27/2016	Wed	Draft	Continued preparation of reply brief.
Wright/RWCA	2	Eppsteiner, George	5/5/2016	Thu	Attend	Preparation for oral argument.
Wright/RWCA	2	Eppsteiner, George	5/5/2016	Thu	Analyze	Preparation for oral argument.
Wright/RWCA	2.6	Eppsteiner, George	5/9/2016	Mon	Travel	Travel from Office to Richmond for Fourth Circuit Argument.
Wright/RWCA	1.8	Eppsteiner, George	5/9/2016	Mon	Attend	Attend Fourth Circuit Argument.
Wright/RWCA	2.6	Eppsteiner, George	5/9/2016	Mon	Travel	Return travel from Fourth Circuit argument in Richmond to office.

TOTAL TIME 110.3

RWCA/Wright - Christopher Ketchie Time Records

Project	Hours	User	Time Date	DOW	Task	Description
Wright	1	Ketchie, Christopher D.	3/29/2013	Fri	Analyze	proposed district plans
Wright	5	Ketchie, Christopher D.	4/30/2013	Tue	Analyze	import shapefiles
Wright	4	Ketchie, Christopher D.	5/3/2013	Fri	Analyze	geocode plaintiff residences
Wright	5	Ketchie, Christopher D.	5/7/2013	Tue	Analyze	examine population data
Wright	6.25	Ketchie, Christopher D.	5/8/2013	Wed	Analyze	review alternative plans
Wright	8	Ketchie, Christopher D.	6/7/2013	Fri	Analyze	examine equal population alternatives
Wright	4	Ketchie, Christopher D.	6/10/2013	Mon	Research	alternative district configurations
Wright	2	Ketchie, Christopher D.	6/12/2013	Wed	Research	new district population data
Wright	4	Ketchie, Christopher D.	6/13/2013	Thu	Research	comparison of previous plans
Wright	4.5	Ketchie, Christopher D.	6/19/2013	Wed	Analyze	partisan impacts of new plans
Wright	4	Ketchie, Christopher D.	6/20/2013	Thu	Analyze	partisan impacts of new plans
Wright	6	Ketchie, Christopher D.	6/24/2013	Mon	Analyze	Stam amendments
Wright	3	Ketchie, Christopher D.	6/27/2013	Thu	Analyze	partisan impacts of new plans
Wright	2	Ketchie, Christopher D.	8/7/2013	Wed	Analyze	Precinct Update for Clients
Wright	5.5	Ketchie, Christopher D.	8/14/2013	Wed	Analyze	Stats comparing plans
Wright	3	Ketchie, Christopher D.	8/21/2013	Wed	Analyze	Analysis for client (Maps and Statistics)

WRIGHT ONLY TIME**67.25**

Wright/RWCA	0.25	Ketchie, Christopher D.	3/9/2015	Mon	Analyze	Comparison between Wake School Board and BOCC Districts for Allison
Wright/RWCA	4	Ketchie, Christopher D.	3/13/2015	Fri	Analyze	Wake County Redistricting (Numbered District Alternative)
Wright/RWCA	6	Ketchie, Christopher D.	3/16/2015	Mon	Analyze	Redistricting / Incumbent & Plaintiff Geocoding

Wright/RWCA	0.5	Ketchie, Christopher D.	3/17/2015	Tue	email to	Preparing Block Assignment Files - Emailing Instructions to Erika Churchill
Wright/RWCA	0.75	Ketchie, Christopher D.	3/18/2015	Wed	Research	Checking Additional Plaintiff Geocodes / D4 Precinct List
Wright/RWCA	0.75	Ketchie, Christopher D.	4/1/2015	Wed	Research	Checking Additional Plaintiff Geocodes / D4 Precinct List
Wright/RWCA	0.5	Ketchie, Christopher D.	4/7/2015	Tue	Research	Plaintiff District Lookup for Anita
Wright/RWCA	0.5	Ketchie, Christopher D.	4/8/2015	Wed	Research	Plaintiff District Lookup for Anita
Wright/RWCA	2.5	Ketchie, Christopher D.	4/8/2015	Wed	Analyze	Wake County Commissioner District Split Precinct Analysis for Anita
Wright/RWCA	1	Ketchie, Christopher D.	4/9/2015	Thu	Research	Plaintiff District Lookup for Anita
Wright/RWCA	3	Ketchie, Christopher D.	4/9/2015	Thu	Research	Reading Harris v. McCrory Analysis
Wright/RWCA	3.25	Ketchie, Christopher D.	4/13/2015	Mon	Analyze	Wake County Districts - Precinct Assignments for Plaintiff Identification

TOTAL TIME 90.25

RWCA/Wright - Fred McBride - Time Records

Project	Hours	User	Time Date	DOW	Task	Description
RWCA/Wright	1	McBride, Fred G.	10/11/2015	Sun	Conf Call	conf call with expert
RWCA/Wright	4	McBride, Fred G.	10/12/2015	Mon	Analyze	Review/research complaint, maps, data, construct and send shape file to expert
RWCA/Wright	1.6	McBride, Fred G.	10/14/2015	Wed	Analyze	analyze election returns, call with expert
RWCA/Wright	3.5	McBride, Fred G.	10/15/2015	Thu	Analyze	Format election returns to csv file, call with expert
RWCA/Wright	6.3	McBride, Fred G.	10/16/2015	Fri	Analyze	Format election returns to csv file, call with expert
RWCA/Wright	6.6	McBride, Fred G.	10/19/2015	Mon	Analyze	Format election returns to csv file
RWCA/Wright	7.3	McBride, Fred G.	10/20/2015	Tue	Analyze	Format election returns to csv file
RWCA/Wright	6.3	McBride, Fred G.	10/21/2015	Wed	Analyze	Format election returns to csv file
RWCA/Wright	3.1	McBride, Fred G.	10/27/2015	Tue	Analyze	Format election returns to csv file, research candidate pol info
RWCA/Wright	6.7	McBride, Fred G.	10/29/2015	Thu	Analyze	Format election returns to csv file, research candidate pol info
RWCA/Wright	7.7	McBride, Fred G.	10/30/2015	Fri	Analyze	Format election returns to csv file, research candidate pol info
RWCA/Wright	0.8	McBride, Fred G.	11/5/2015	Thu	Analyze	Format election returns to csv file, research candidate pol info
RWCA/Wright	2	McBride, Fred G.	11/16/2015	Mon	Analyze	Prepare work product for Defendant's Doc Request
RWCA/Wright	0.3	McBride, Fred G.	11/17/2015	Tue	Analyze	Prepare work product for Defendant's Doc Request
RWCA/Wright	0.5	McBride, Fred G.	12/1/2015	Tue	Analyze	Prepare work product for Defendant's Doc request
RWCA/Wright	5.8	McBride, Fred G.	12/2/2015	Wed	Analyze	Analysis of expert report, research methodology used
RWCA/Wright	0.2	McBride, Fred G.	12/3/2015	Thu	Analyze	email expert re travel
RWCA/Wright	1	McBride, Fred G.	12/4/2015	Fri	Analyze	Review expert travel details
RWCA/Wright	7.3	McBride, Fred G.	12/12/2015	Sat	Analyze	Prepare maps, exhibits for trial
RWCA/Wright	5.8	McBride, Fred G.	12/14/2015	Mon	Prepare	Trial prep, review experts, witness list
RWCA/Wright	9	McBride, Fred G.	12/15/2015	Tue	Review	Trial prep, review experts, witness list
RWCA/Wright	12.2	McBride, Fred G.	12/16/2015	Wed	Attend	1st day of trial
RWCA/Wright	9.2	McBride, Fred G.	12/17/2015	Thu	Attend	2nd day of trial

TOTAL TIME
108.2

RWCA/Wright Time Records - Jaclyn Maffetore

Name	Date	Work Description	Case	Time Spent
Jaclyn Maffetore	March 1, 2016	Reading recently issued opinion on our case to prepare for appeal	RWCA	4.0
Jaclyn Maffetore	March 2, 2016	Reading recently issued opinion on our case to prepare for appeal, picking out errors of fact or law	RWCA	2.5
Jaclyn Maffetore	March 2, 2016	Researching deadlines following notice of appeal and creating chart	RWCA	0.8
Jaclyn Maffetore	March 3, 2016	Researching deadlines following notice of appeal and creating chart	RWCA	0.5
Jaclyn Maffetore	March 9, 2016	Reviewing trial court findings of fact	RWCA	1.5
Jaclyn Maffetore	March 14, 2016	Proofreading notices of appeal	RWCA	0.5
Jaclyn Maffetore	April 6, 2016	Researching weight afforded to legislative testimony	RWCA	6.2
Jaclyn Maffetore	April 7, 2016	Researching and drafting memo on weight afforded to legislative testimony	RWCA	3.5
Jaclyn Maffetore	April 7, 2016	Researching clearly erroneous standard of review	RWCA	5.2
Jaclyn Maffetore	April 8, 2016	Researching and drafting research memo on clearly erroneous standard of review	RWCA	6.8
Jaclyn Maffetore	April 12, 2016	Compiling and editing trial exhibits and ordering them to form portion of Joint Appendix for appeal	RWCA	5.8
Jaclyn Maffetore	April 13, 2016	Adding citations to draft brief from joint appendix	RWCA	5.0
Jaclyn Maffetore	April 14, 2016	Proofreading brief for appeal	RWCA	2.0
			Total	44.3

Wright RWCA Legal Fellow Time

Date	Timekeeper	Case	Hours	Task	Description
3/21/2013	Collins, Jeremy	Wright	0.25	Conf.	meeting with Anita to discuss conducting client conference, retainers
3/27/2013	Collins, Jeremy	Wright	0.35	Conf.	Conference with Anita, review Wake Co. Sch. Bd. bill
4/2/2013	Collins, Jeremy	Wright	2	Meeting	in Raleigh with Anita & clients
4/3/2013	Collins, Jeremy	Wright	0.5	emails	to clients re signing retainer agreements
4/4/2013	Collins, Jeremy	Wright	1.5	Telephone call-Client	calls to clients to obtain signed copies of retainer agreements
6/10/2013	Collins, Jeremy	Wright	3.4	Legal Research	re: one-person, one vote claims
6/11/2013	Collins, Jeremy	Wright	4.5	Draft	legal memorandum on voting rights cases
6/12/2013	Collins, Jeremy	Wright	2.25	Edit	draft brief and update research
8/5/2013	Collins, Jeremy	Wright	0.25	Conf.	with Anita to review clients in school board case
8/5/2013	Collins, Jeremy	Wright	2.5	Meeting	with potential clients in Raleigh
8/6/2013	Collins, Jeremy	Wright	0.3	Research	information about precincts in districts, email to Yevonne Brannon
8/7/2013	Collins, Jeremy	Wright	0.25	Email	to clients with retainer agreements
8/12/2013	Collins, Jeremy	Wright	0.6	Review	draft complaint
8/21/2013	Collins, Jeremy	Wright	2.3	Legal Research	re: proper defendants for constitutional claims & memo to Allison
8/22/2013	Collins, Jeremy	Wright	0.8	Draft	email to clients attaching filed documents and explaining next steps
Total			21.75		
7/14/2014	Heaney, Chris	Wright	2.45	Research	cases related to legal issues raised by reply brief
7/15/2014	Heaney, Chris	Wright	1.33	Review	reviewing briefs for 4th Circuit appeal
7/15/2014	Heaney, Chris	Wright	1.58	Edit	revising reply brief
Total			5.36		
4/13/2015	Crupi, Joseph	RWCA	5	Prepare	Pleadings file
6/17/2015	Crupi, Joseph	RWCA	0.75	Review	Additional pleadings and organize files
8/24/2015	Crupi, Joseph	RWCA	2.5	Prepare	Additional pleadings for file
Total			8.25		